



BUREAU OF ENVIRONMENT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BOB WISE
GOVERNOR

Division of Waste Management

MICHAEL O. CALLAGHAN
SECRETARY

NOTICE OF VIOLATION

DATE: April 22, 2002

TIME: 0840 hours

ISSUED TO: Wheeling Corrugating Company

EPA I.D.#: WVD000797720

FACILITY MAILING ADDRESS: State Route 2, Beech Bottom, WV 26030

FACILITY REPRESENTATIVE: Pete Barren, Operations Manager

On the date and time specified, an authorized agent of the Director of the Division of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 22, Section 18 and/or an Order or Permit issued pursuant to §22-18. During that inspection the following violation(s) were noted:

1.A. (Regulation) 40 CFR Part 262.34(a)(2) as referenced by Title 33, Series 20, Section 5.1 of the West Virginia Hazardous Waste Management Rule.

B. (Facts) Wheeling Corrugating Company failed to mark the date of accumulation on drums of hazardous waste.

2.A. 40 CFR Part 262.34(a)(3) as referenced by Title 33, Series 20, Section 5.1 of the West Virginia Hazardous Waste Management Rule.

B. Wheeling Corrugating Company failed to label drums of hazardous waste with the words "hazardous waste"

3.A. 40 CFR Part 262.34(a) as referenced by Title 33, Series 20, Section 5.1 of the West Virginia Hazardous Waste Management Rule.

B. Wheeling Corrugating Company stored drums of hazardous waste for greater than ninety days without a hazardous waste permit.

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial actions:

- (1) Immediately ensure all containers of hazardous waste are properly labeled and dated.
- (2) Immediately ensure all containers of hazardous waste are stored on site for not longer than ninety days.
and the facility does not speculatively accumulate containers of used solvent.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Division of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §22-18-17.

District Phone: (304) 238 - 1075

Issued By: Jamie Fowler

District Fax: (304) 238 - 1006

Title: Environmental Inspector



**Division of Environmental Protection
Office of Air Quality**

INSPECTION FACT SHEET

COMPANY NAME: Wheeling Corrugating Company
Beech Bottom

EPA ID #: WVD000797720
PLANT ID #: 00900004
PERMIT #: NA

MAILING ADDRESS: P.O. Box 37
Beech Bottom, WV 26030

FACILITY TYPE: Large Quantity Generator
LOCATION: State Route 2
COUNTY: Brooke
REGION: I

COMPANY CONTACT: Jim Howell
PHONE: 304-234-4275

PURPOSE: inspection
APPLICABLE REGS: Regulation 25

DATE INSPECTED: April 10, 2001
INSPECTORS: Richard Fenton, OAQ

DATE PREPARED: October 4, 2001
PREPARED BY: Richard Fenton
REVIEWED BY: Lucia Pontiveros

FACILITY STATUS CODE: 30, facility in compliance
VIOLATIONS:



INSPECTION MEMORANDUM

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Division of Air Quality

Company:	Wheeling Corrugating Company		Facility:	Beech Bottom WVD000797720	
Region:	1	Plant ID#:	00900004	Regulations:	25

Inspected By: Richard Fenton

Title: Engineer

Memo Date: October 4, 2001

Inspection Date: April 10, 2001

INTRODUCTION

On April 10, 2001, an unannounced inspection was made of the Wheeling Corrugating facility located near Beech Bottom, WV. This writer was the inspector. The contact person at the facility is Mr. Jim Howell, Environmental Manager. He introduced the writer to Mr. Richard Roy, who provided escort during the site visit.

REGULATORY APPLICABILITY

The facility is a large quantity generator of hazardous waste. As such, they are subject to the regulatory requirements for air emissions from the storage of the waste. The applicable rules are contained in 40CFR265, Subpart CC. State rule 45CSR25 adopted the federal rules by reference.

PROCESS DESCRIPTION

The facility stores its waste in 55 gallon containers. The waste is solvent and non-organic material used in the processing of the corrugated steel.

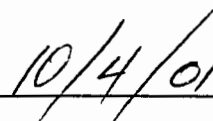
COMPLIANCE EVALUATION

The inspection consisted of a visual inspection of the waste storage area. The drummed material, on-site during the inspection, was non-organic, chromium waste. All drums were closed and in good condition.

CONCLUSIONS

The facility is in compliance with WV state regulation 45CSR25.





Inspection of Wheeling Corrugating
Inspected on April 10, 2001
Page 1

Photographs Taken:	no	ITS Updated:	
Visual Emissions Taken:	no	Facility Status Code:	

NON-CONFIDENTIAL



Office of Waste Management
1356 Hansford Street
Charleston, West Virginia 25301
Phone Number: (304) 558-2505
Fax Number: (304) 558-0256

West Virginia Department of Environmental Protection

Bob Wise
Governor

Michael O. Callaghan
Secretary

May 15, 2001

Ms. Harriet Morrell (3WCMD11)
U.S. EPA Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Dear Ms. Morrell:

Below is a list of Large Quantity Generators with new mailing addresses. I obtained this information by calling each facility. Please change the mailing addresses in your database. If you have any questions please call me at (304) 558-5989.

CSX Transportation 500 Water Street J-265 Jacksonville, Florida 32202	WVD001863679
Cytec Industries No. 1 Hellman Ave. Willow Island, WV 26134	WVD004341491
G.E. Specialty Chemicals Inc NP 1000 Morgantown Industrial Park Morgantown, WV 26501	WVD980552384
G.E. Specialty Chemicals Inc SP 1000 Morgantown Industrial Park Morgantown, WV 26501	WVD061776977
Pratt & Whitney Engine Services Inc 1525 Midway Park Road Bridgeport, WV 26330	WVD055530604
Quad/Graphics Inc 855 Caperton Blvd. Martinsburg, WV 25401	WVR000007807
Roll Coater 4502 Freedom Way Weirton, WV 26062	WVR000008003

"To use all available resources to protect and restore West Virginia's
environment in concert with the needs of present and future generations."



West Virginia
Department of
Environmental Protection

Rec'd 5/21/01

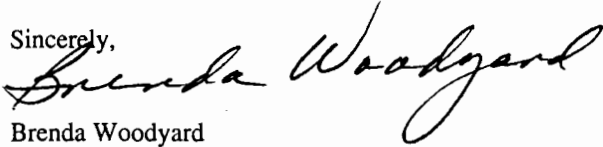
Wheeling-Pittsburgh Steel Corp
Rt. 2 Box 37
Beech Bottom, WV 26030

WVD000797720

Wheeling-Pittsburgh Steel Corp
1134 Market Street
Wheeling, WV 26003

WVD004319539

Sincerely,

A handwritten signature in cursive script that reads "Brenda Woodyard". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Brenda Woodyard
Office Assistant II



United States

Environmental Protection Agency

**ACKNOWLEDGEMENT OF NOTIFICATION OF
REGULATED WASTE ACTIVITY (VERIFICATION)**

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation is identified below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Biennial Reports that generators of hazardous waste, and owner and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA ID No.: WVD000797720

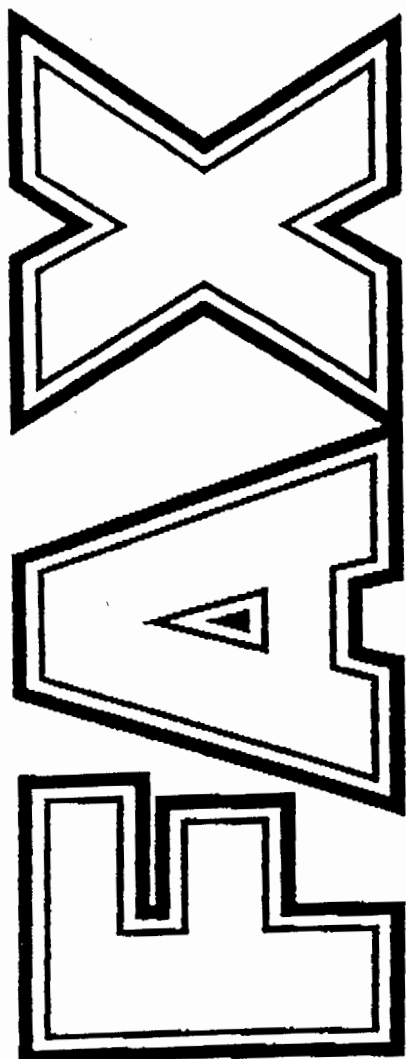
Installation Address:

WHEELING-PITTSBURG STEEL CORP
RT 2
BEECH BOTTOM, WV 26030

Mailing Address:

RT 2 BOX 37
BEECH BOTTOM, WV 26030
ATTN:MARTIN STEPHENSON, ENV COOR I

March 9, 2001



T R A N S M I T T A

**WHEELING-CORRUGATING COMPANY
ENVIRONMENTAL/SAFETY/HEALTH DEPT.**

To: CHRISTOPHER M. GATENS
ENVIRONMENTAL INSPECTOR

Fax: 304-558-0256

From: Jim Howell
Manager, Environmental, Safety & Health

Date: 5-27-99

Pages: 4 Including Cover

Re: CHRIS

THIS IS OUR FOLLOW-UP TO
YOUR INSPECTION. AS YOU CAN SEE
BY PHOTO THE TANK HAS BEEN
LABELED. I HAVE MAILED YOU A
HARD COPY WITH COLOR PHOTO.

Jim Howell


**Wheeling
Corrugating
Company**

DIVISION OF WHEELING-PITTSBURGH STEEL CORP.

Since **1890**

1134 Market Street
Wheeling, WV 26003
(304) 234-2790
FAX (304) 234-2613



JAMES M. HOWELL
MANAGER ENVIRONMENTAL, SAFETY & HEALTH

Telephone: (304) 234-2790
FAX: (304) 234-2210

May 27, 1999

Chief
OFFICE OF WASTE MANAGEMENT
1356 Hansford Street
Charleston, WV 25301

**RE: Wheeling-Pittsburgh Steel Corporation
Beech Bottom Plant - I.D. #WVD000797720
"Notice of Violation" dated April 23, 1999**

CHIEF

Please find enclosed pictures of the 4,000 gallon "Used Oil" tank with proper labeling. It was labeled the same day, following the inspection of our plant.

If you should have any questions, or need additional information, please do not hesitate to call me at 304-234-2790.

Very truly yours,

James M. Howell
Manager-Environmental, Safety & Health

c: Christopher M. Gatens WVDEP
L. F. Albrecht
M. W. O'Leary
W. Samples

Sent via Certified Z 362 198 586





Office of Waste Management
Compliance Assurance and Emergency Response
1356 Hansford Street
Charleston, WV 25301-1401
304-558-5989/Fax 304-558-0256

West Virginia Division of Environmental Protection

Cecil H. Underwood
Governor

Michael P. Miano
Director

NOTICE OF VIOLATION

DATE: April 23, 1999
ISSUED TO: Wheeling Corrugating Company - Beech Bottom Plant
EPA I.D.#: WVD000797720
FACILITY MAILING ADDRESS: 1134 Market Street
Wheeling, WV 26003
FACILITY REPRESENTATIVE: Jim Howell, Manager of Environmental Safety & Health

On April 1, 1999, authorized agents of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 22, Section 18 and/or an Order or Permit issued pursuant to §22-18. During that inspection the following violation(s) were noted:

1. A. (Regulation) 40 CFR Part 279.22(c)
- B. (Facts) The facility failed to label a 4000 gallon tank near the far end of the main building with the words "Used Oil "

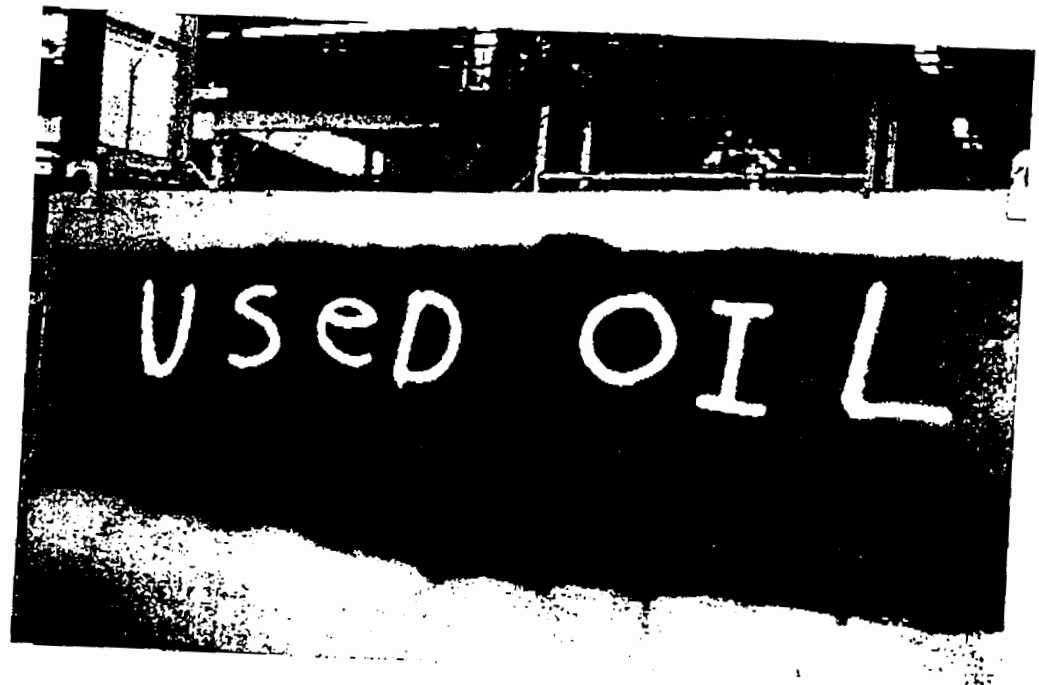
In order to attain compliance with the cited Code and/or Regulations, the facility must perform the following remedial actions:

1. Label the 4000 gallon tank holding used oil with the words "Used Oil".

Within 20 days of receipt of this Notice, document your compliance by writing to the Chief, Office of Waste Management, 1356 Hansford Street, Charleston, WV 25301 and send a photocopy or facsimile of that correspondence to this Inspector. A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §22-18-17.

District Phone: (304) 558-5989
District Fax: (304) 558-1143

Issued by: Christopher M. Gatens
Title: Environmental Inspector





Office of Waste Management
Compliance Assurance and Emergency Response
1356 Hansford Street
Charleston, WV 25301-1401
304-558-5989/Fax 304-558-0256

West Virginia Division of Environmental Protection

Cecil H. Underwood
Governor

Michael P. Miano
Director

May 11, 1999

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Jim Howell
Manager of Environmental Safety & Health
Wheeling Corrugating Company
Route 2
Beech Bottom, WV 26030

Dear Mr. Howell:

Enclosed is a copy of the **Compliance Inspection Evaluation (CEI) Report** completed by a representative of the Chief of the Office of Waste Management. This report is based on the inspection conducted on April 1, 1999.

Please refer to the **Notice of Violation** for those violations discovered during the course of this inspection. As a result of those violations, this report is being referred for the following action:

<input type="checkbox"/>	Correct noted violations
<input checked="" type="checkbox"/>	Notice of Violation
<input type="checkbox"/>	Civil and Administrative Penalty (CAP)
<input type="checkbox"/>	Enforcement Referral

A copy of this report is being transmitted to the United States Environmental Protection Agency (U.S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation. If you have any questions concerning the inspection or the attached report, please to contact Inspector Christopher M. Gatens at **(304) 558-5989**.

Sincerely,

Thomas A. Fisher
Field Operations Program Manager
Compliance Assurance and Emergency Response

TAF/kw

cc: Marie Owens, U.S. EPA Region III
Inspector Christopher M. Gatens
File

"To use all available resources to protect and restore West Virginia's environment in concert with the needs of present and future generations."



West Virginia
Division of
Environmental Protection

EVALUATION - VIOLATION - ENFORCEMENT FORM

04/95 VERSION

Handler ID Number

WVD000797720

Contact Name

Jim Howell

RESERVED FOR
EPA USE

Handler Name

Wheeling Corrugating Company

Street

Route 2

City

Beech Bottom, WV

UNIVERSE CHANGE REQUIRED

YES

NO

X

I. Indicate the facility's current universe(s):

II. Indicate the new RCRIS Generator Universe (mark only one):

LQG []
SQG []

CEG []

NON-HANDLER []

CLOSED []

NOTE: All TSD activity changes must be handled by the state data coordinator and cannot be made using this form

III. Indicate the new transporter status (Mark here only if the facility requires a transporter status change):

Transporter []

If the transporter box is checked, you must check at least one of the boxes below:

Mark Mode of Transportation

[] Air

[] Rail

[] Highway

[] Water

[] Other

Non-Transporter []

Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.

EVALUATION

Add X

Change

Delete

Date

04 01 99

Number

Agency

5

Type

CEI

Reason

Branch

CA

Person

WVCMG

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GGR

E

GSC

TWD

DGW

DOR

DWP

BRR

FEA

GLB

E

GSQ

DCH

DLB

DPB

DIN

BPS

CSS

GMR

E

GEX

DCL

DLF

DPP

DIA

BIS

UOR

E

GOR

F

TGR

DCP

DLT

DSI

DPS

BCE

UWR

E

GPT

F

TMR

DFR

DMC

DTR

DOP

BDT

GRR

E

TOR

DGS

DMR

DTT

DMI

CAS

Comments RCRA Compliance Evaluation Inspection

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency

Number

Area

Date Determined

Agency

Number

Area

Date Determined

VIOLATION

Add X

Change

Delete

Link to Above Evaluation? (Y/N) Y

Agency

5

Number

Area

UOR

Class

2

Regulation Type

FR

Regulation Citation

40 CFR Part 279.22(c)

Returned to Compliance

Date Determined

04 01 99

Priority

5

Branch

CA

Person

WVCMG

Scheduled

5-24-99

Actual

Comments Failure to label a used oil tank with the words "Used Oil".

Required

Required if pertinent

Req'd for prev. reported data

Not req'd by EPA

04/95 VERSION

Handler ID Number

Handler Name

WVD000797720

Wheeling Corrugating Company

VIOLATION

Add

Change

Delete

Link to Above Evaluation?(Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

Date Determined

Priority

Branch

Person

Returned to Compliance

Scheduled

Actual

Comments:

VIOLATION

Add

Change

Delete

Link to Above Evaluation?(Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

Date Determined

Priority

Branch

Person

Returned to Compliance

Scheduled

Actual

Comments:

VIOLATION

Add

Change

Delete

Link to Above Evaluation?(Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

Date Determined

Priority

Branch

Person

Returned to Compliance

Scheduled

Actual

Comments:

ENFORCEMENT

Add

X

Change

Delete

Link to Above Evaluation?(Y/N)

Date

Number

Agency

Type

Branch

Person

Attorney

040199

S

120

CA

wrcmg

Docket Number

Penalty Type

Penalty Amount

Multimedia Enforcement Codes
(Place an 'X' next to all that apply)

AIR

EPCRA

INSPECTION FACT SHEET

COMPANY NAME: Wheeling Corrugating Company **EPA ID #:** WVD000797720

MAILING ADDRESS: Route 2
Beech Bottom, WV 26030 **FACILITY TYPE:** Large Quantity
Generator

LOCATION: Route 2 Beech Bottom, WV **COUNTY:** Brooke

PHONE: 304/234-2790 **HANDLING CODES:**

FACILITY CONTACT: Jim Howell, Manager of Environmental Safety & Health

INSPECTION TYPE: RCRA Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act,
Chapter 22-18, and 40 CFR Parts 260-279.

HAZARDOUS WASTES GENERATED:

(For Conditionally Exempt and Small Quantity Generators, list type of waste, amount generated, and how disposed.)

D007-Waste Materials (Rags) Contaminated with TCLP Chromium
D007- Hazardous Waste Solid from the Painting Preparation of Metal Rolls
F003/F005-Waste Paint Related Material

DATE INSPECTED: April 1, 1999

INSPECTORS: (1) Christopher M. Gatens **VIOLATIONS:** Yes
(2) Thomas A. Fisher
(3)

DATE PREPARED: April 22, 1999

PREPARED BY: Christopher M. Gatens

COMPLIANCE EVALUATION INSPECTION

RE: Wheeling Corrugating Company
Beech Bottom Plant

EPA ID: WVD000797720

DATE INSPECTED: April 1, 1999

INSPECTED BY: Christopher M. Gatens, Environmental Inspector
Thomas A. Fisher, Field Operations Manager - CAER

DATE PREPARED: April 22, 1999

PREPARED BY: Christopher M. Gatens

On April 1, 1999, the above listed WVDEP personnel conducted a Compliance Evaluation Inspection of Wheeling Corrugating Company of Beech Bottom, WV. Upon arrival for this inspection at 8:20 am, we met Operations Manager, Mark W. O'Leary and Director of Environmental Control, William R. Samples. Upon presentation of credentials, the representatives were informed that this inspection would emphasize the company's compliance with the WV Hazardous Waste Management Act (Chapter 22, Article 18) and the Regulations promulgated thereunder.

The Wheeling Corrugating Company at Beech Bottom, WV fabricates various roofing and decking products from sheet metal rolls. Hazardous wastes are generated at the facility as a result of manufacturing processes and painting application. The company is classified as a Large Quantity Generator of hazardous waste and has notified the EPA for the generation of several D and F waste codes.

The physical portion of the inspection was conducted to view hazardous waste generation and storage areas. The finish coating line room was inspected and paint spillage/overspray was noted on the concrete floor near the application area. The company used rags to soak up the excess paint and the saturated cloth was taken to the satellite accumulation storage area for management purposes. The primer coating line was inspected and similar paint management procedures were utilized in the area. It was suggested that housekeeping practices needed to be improved in both painting line areas in order to reduce the amount of paint on the floors.

The satellite accumulation storage room was inspected near the painting lines and two 55-gallon drums were being maintained for hazardous waste accumulation. The drums were properly labeled and managed according to regulation. The soaked rags from the two painting lines were also taken to this area and allowed to drip into a

55-gallon drum to reduce the saturation. The spent rags were later managed as a D007 (TCLP-Chromium) hazardous waste and the excess paint was placed in a 300 gallon tote for return to the paint supplier. The company also managed a satellite drum for TCLP-Chromium contaminated media that was generated from the painting preparation of the rolls.

Waste management procedures were viewed in the Warehouse Building and in the Wastewater Treatment Plant. Fifteen drums of waste water softener resin were observed in the warehouse area and the company was waiting for analysis. Several drums of old chemical products were also noted in the area that the company had been storing for some time. Ten drums of "Grinder Sludge" from the machine shop were present at the far end of the main building and later were determined to be oily solids. A large capacity holding tank for used oil was also located here and it was noted that it was not labeled with the words "Used Oil". One rolloff of sludge was viewed at the treatment plant and the material was disposed at a USA Waste municipal landfill in Pennsylvania.

Five 55-gallon drums of hazardous waste were present in the 90-day "Hazardous Waste Storage Building". The containers were managed, labeled, and dated according to regulation. The waste consisted of contaminated rags from the satellite accumulation building.

Weekly inspection logs for the drum storage area and RCRA personnel training records were viewed in Mr. O'Leary's office. The inspection logs were complete and the facility had an extensive hazardous waste training program in place. MSDS information was also viewed for the following materials : COIL COAT PRIMER, ROLUBRICANT 23, and QUAKER GRAY POLY 10S.

The shipping manifests and the contingency plan were viewed on April 21, 1999 with Manager of Environmental Safety and Health, Jim Howell. Hazardous waste manifests for 1998 and 1999 were viewed in his office and found to be in order. Shipping records for universal waste and used oil were also on file. The RCRA contingency plan with the proper updated information was demonstrated by Mr. Howell during this visit. The company's most recent shipment of the 300 gallon recoverable paint tote to the manufacturer/supplier was in 1995. The company has an agreement with the Valspar Corporation to return the recovered material provided it meets certain specifications.

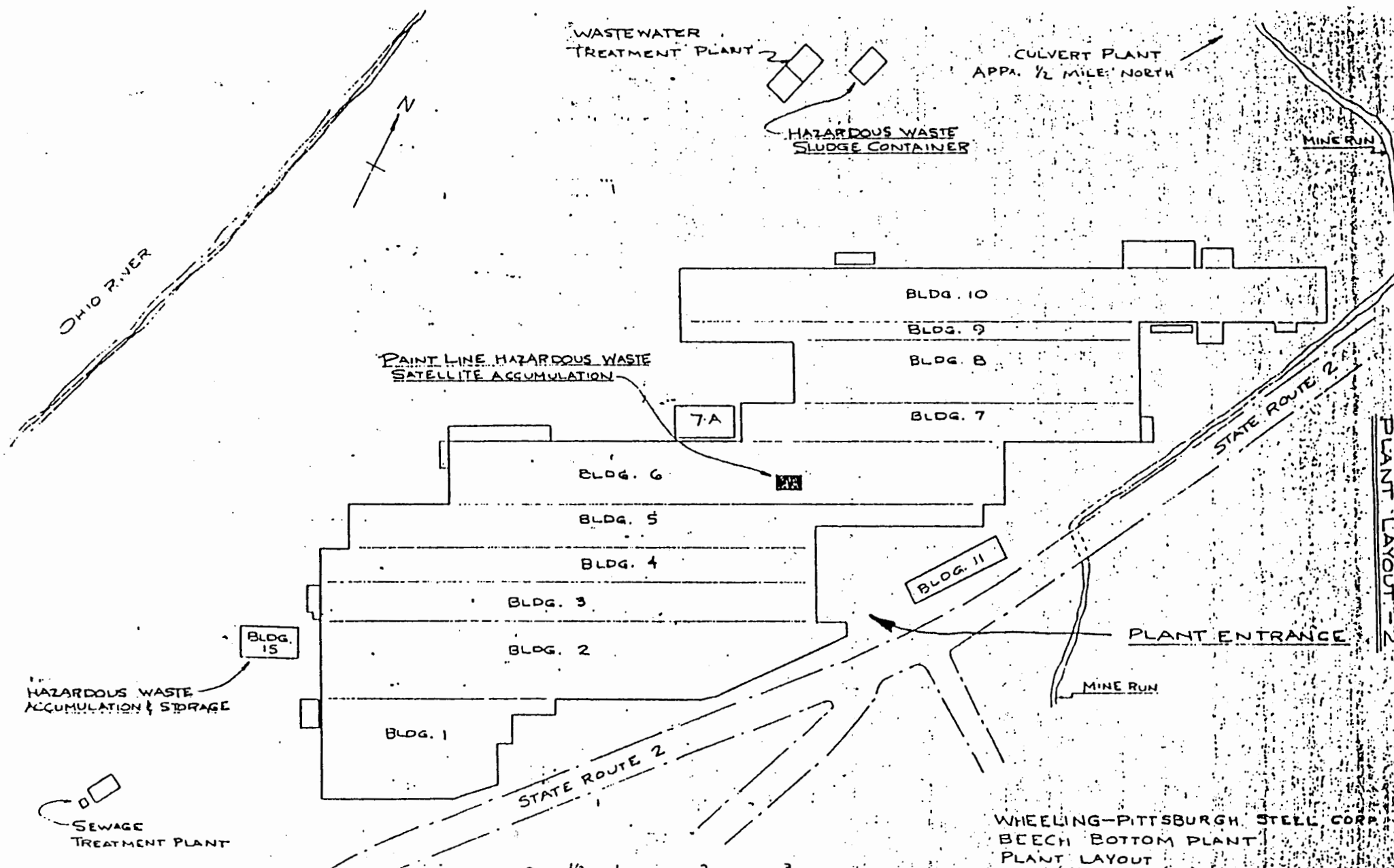
After a brief discussion with Mr. Howell, I concluded the inspection and departed his office at 2:05 pm.

WASTE MINIMIZATION PRACTICES

Minimization practices at this facility include the recovery of paint/solvent from the saturated rags in the satellite accumulation building and the recycling of metal 55-gallon drums at Acme Barrel Company in Chicago, Illinois.

COMPLIANCE EVALUATION

See Notice of Violation.



WASTEWATER
TREATMENT PLANT

CULVERT PLANT
APPA. 1/2 MILE NORTH

HAZARDOUS WASTE
SLUDGE CONTAINER

OHIO RIVER

MINE RUN

PAINT LINE HAZARDOUS WASTE
SATELLITE ACCUMULATION

BLDG. 10

BLDG. 9

BLDG. 8

BLDG. 7

7A

BLDG. 6

BLDG. 5

BLDG. 4

BLDG. 3

BLDG. 2

BLDG. 1

BLDG. 11

PLANT ENTRANCE

MINE RUN

STATE ROUTE 2

STATE ROUTE 2

BLDG. 15
HAZARDOUS WASTE
ACCUMULATION & STORAGE

SEWAGE
TREATMENT PLANT

WHEELING-PITTSBURGH STEEL CORP.
BEECH BOTTOM PLANT
PLANT LAYOUT

PLANT LAYOUT-2

0 1/2 1 2 3

FFuso-Rain

1968
PHOTOREVISED 1979
AMS 4864 II NW-SERIES V854



Office of Waste Management
Compliance Assurance and Emergency Response
1356 Hansford Street
Charleston, WV 25301-1401
304-558-5989/Fax 304-558-0256

West Virginia Division of Environmental Protection

Cecil H. Underwood
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Michael P. Miano
Director

NOTICE OF VIOLATION

DATE: April 23, 1999
ISSUED TO: Wheeling Corrugating Company - Beech Bottom Plant
EPA I.D.#: WVD000797720
FACILITY MAILING ADDRESS: 1134 Market Street
Wheeling, WV 26003
FACILITY REPRESENTATIVE: Jim Howell, Manager of Environmental Safety & Health

On April 1, 1999, authorized agents of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 22, Section 18 and/or an Order or Permit issued pursuant to §22-18. During that inspection the following violation(s) were noted:

1. A. (Regulation) 40 CFR Part 279.22(c)
 - B. (Facts) The facility failed to label a 4000 gallon tank near the far end of the main building with the words "Used Oil "

In order to attain compliance with the cited Code and/or Regulations, the facility must perform the following remedial actions:

1. Label the 4000 gallon tank holding used oil with the words "Used Oil".

Within 20 days of receipt of this Notice, document your compliance by writing to the Chief, Office of Waste Management, 1356 Hansford Street, Charleston, WV 25301 and send a photocopy or facsimile of that correspondence to this inspector. A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §22-18-17.

District Phone: (304) 558-5989
District Fax: (304) 558-1143

Issued by: Christopher M. Gatens
Title: Environmental Inspector

To use all available resources to protect and restore West Virginia's environment in concert with the needs of present and future generations..



West Virginia
Division of
Environmental Protection



**Division of Environmental Protection
Office of Air Quality**

INSPECTION FACT SHEET

COMPANY NAME: Wheeling-Pittsburgh Steel Corporation

EPA ID #: WVD000797720
PLANT ID #: 03-53-009-0002
PERMIT #: No 45 CSR 25 permit

MAILING ADDRESS: 1134 Market Street
Wheeling, WV 26003

FACILITY TYPE: a. By product coke plant
b. 90 day unpermitted tank and container hazardous waste storage

LOCATION: Beach Bottom
COUNTY: Brooke
REGION: 1

COMPANY CONTACT: Bill Polomik, Environmental Coordinator
PHONE: (614) 283-5663

PURPOSE: Compliance evaluation
APPLICABLE REGS: 45 CSR 25

DATE INSPECTED: 7/24/96
INSPECTORS: J. D. McClung
R. W. Fenton

DATE PREPARED: 7/29/96
PREPARED BY: J. D. McClung
REVIEWED BY: L. S. Pontiveros

FACILITY STATUS CODE: 30
VIOLATIONS: None



INSPECTION MEMORANDUM

DIVISION OF ENVIRONMENTAL PROTECTION

West Virginia Office of Air Quality

Company:	Wheeling-Pittsburgh Steel Corp.			Facility:	Beach Bottom
Region:	1	Plant ID#:	03-54-009-0002	Regulations:	45 CSR 25

Inspected By: Jonathan D. McClung

Title: Engineer-in-Training I

Memo Date: July 29, 1996

Inspection Date: July 24, 1996

On July 24, 1996, at approximately 12:00 p.m., an unannounced inspection was conducted of Wheeling-Pittsburgh Steel Corporation (WPSC) located at Beach Bottom, WV. Richard Fenton, OAQ, accompanied the writer on the inspection. The contact person at the facility was Bill Polomik, Environmental Coordinator. The weather was partly cloudy with light breezes and temperatures in the 70's (°F). The inspection lasted approximately 3.5 hours.

WPSC operates a by-product coke plant at Beach Bottom, WV. The Environmental Protection Agency has identified and listed several specific source hazardous wastes from coking operations in 40 CFR 261.32. For example, the hazardous waste code "K087" corresponds to decanter tank tar sludge from coking operations. West Virginia regulation 45 CSR 25 applies to certain facilities that manage hazardous wastes. The purpose of this inspection was to determine whether the Beach Bottom facility is subject to 45 CSR 25.

The inspection consisted of an opening conference, a tour of specific operations at the facility, and a closing conference. Representing WPSC at the opening conference was Bill Polomik and Ron Rizutto, Plant Superintendent. At this time, several items were discussed concerning used oil/solvents and hazardous waste activities at the plant. Mr. Rizutto indicated that all waste solvents generated at the plant were disposed of by Capitol Parts Washers, Inc. Mr. Rizutto also stated that all used oil is shipped off-site by Wall Over, Inc. Mr. Polomik indicated that the facility does not have a RCRA permit but they do utilize unpermitted 90 day hazardous waste storage in containers. He also indicated that they generate hazardous waste primarily through spills and cleaning of vessels. Mr. Rizutto stated that they typically use generator knowledge to determine whether a waste is hazardous. WPSC declares waste as hazardous without an analysis in instances where process knowledge alone is used. The waste is placed in a container, termed "roll-off box" by WPSC, and is stored for less than 90 days and is disposed of off-site by American Waste, Inc. Mr. Polomik also indicated that the facility generates K087 hazardous waste and recycles it to the coke oven. He stated that this waste is exempt because it is being recycled. A separate company, AKJ, Inc., blends the K087 waste with an additive and feeds the material through a grinder and then returns it to WPSC.

Photographs Taken:	No	ITS Updated:	No
Visual Emissions Taken:	No	Facility Status Code:	30

Inspection of Wheeling-Pittsburgh
Inspected on July 24, 1996
Page 1

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Mr. Polomik accompanied the inspectors on a tour of the facility. The first item inspected was a typical roll-off box at the facility. A roll-off box is a rectangular metal container designed for tractor-trailer transport. It is approximately twenty-five feet long, eight feet wide, and five feet in depth. The boxes are covered by a tarpaulin which is held in place by rubber straps. There were two roll-off boxes in the area, both of which were labeled as hazardous waste. Neither of the two containers had an accumulation date listed anywhere on the containers. The roll-off boxes used at the facility may be subject to 40 CFR 264 subpart CC, as incorporate by reference in 45 CSR 25, when it becomes effective on October 6, 1996. Among other things, the rule requires affected facilities to place organic air emission controls on unpermitted 90 day storage in containers.

The next area inspected was the AKJ, Inc. process. This process is operated by an outside company on WPSC property. The process consists of an additive storage tank, a blend tank, and a conveyor belt feed system. The K087 waste is brought to the process from the point of generation in open top tanks. The waste is pumped into a blend tank where an additive is added. The material is mixed, pumped through a grinder, and then fed to a conveyor belt system, which delivers it to the coke oven to be burned. Significant organic type odors were detected from the open top K087 waste tanks. For this process, 40 CFR 261.4(a)(10) excludes K087 waste from being a solid waste provided that several requirements are met. First, the waste must be hazardous only because it exhibits the Toxicity Characteristic (TC) in 40 CFR 261.24. Secondly, the waste must be recycled to coke ovens or other specific processes. Also, there must be no land disposal of the wastes. WPSC is claiming and operating under this exclusion for the K087 hazardous waste that they generate.

Next, the coke oven area processes were inspected. In this process, coal is heated in an oven to yield relatively pure carbon, which is given the term "coke". Several minutes of black smoke emissions were observed from the coke oven. Mr. Polomik indicated that this was not typical of the operation. The overhead vapors from this process are sent to the by-product section of the plant. Part of the overhead is sent to one of five decanter tanks. The bottom sludge that is produced by the unit is hazardous waste code K087.

Finally, the decanter tank section of the facility was inspected. Five decanter tanks separate the overhead from the coke ovens into a liquid phase and a sludge phase. Mr. Polomik indicated that each tank operates under a gas blanket with the exception of the sludge exit chute on each tank. The sludge exits the tank through a chute into an open top collection tank. Each collection tank was labeled as "Hazardous Waste K087".

Mr. Rizutto joined the inspectors and Mr. Polomik for the closing conference. Mr. Rizutto provided the inspectors with a copy of WPSC's internal hazardous and non-hazardous materials tracking system. A copy is attached to this memorandum. This document

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indicates the date on which a waste is generated and the corresponding disposal date. The document indicates that hazardous wastes generated at the facility are disposed of (shipped off site) in less than ninety days.

In conclusion, WPSC is not subject to 45 CSR 25 at the present. However, the facility could become subject to Regulation 25 on October 6, 1996, when 40 CFR 264 subpart CC becomes effective.

Jonathan D. McClung
Jonathan D. McClung
Engineer-in-Training I

July 29, 1996
July 29, 1996

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HAZARDOUS AND NON-HAZARDOUS MATERIALS STORED ON SITE

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1996

F
C
E

MATERIAL I.D.	DATE GENERATED	STORAGE LOCATION	EST. QUANTITY	SAMPLE DATE	ANALYTICAL #
PRE-COOLER CONTAM SOLS		SEND 41971	11.87 TONS	01-Nov-95	16722-3
ACID SPILL AND CATALYST CLEAN UP	08-Nov-95	SEND 41974-220395	24.87 tons	13-Nov-95	16733-3
LIQUOR SPILL CONTAMINATED SOILS	12-Nov-95		142.87 TONS	13-Nov-95	16734-3
		220575			
		200725			
		200378			
		2145			
		0337			
P.C. MAIN SPRAY LIQUOR SPILL	08-Feb-96	BOX220423	11.94 tons		16734-3
sandblast grit		south end	32.90 tons	22-Apr-96	13223-3
MISCELLANEOUS MATERIAL		south end	104.58 tons	22-Apr-96	19106
SINTER PLANT BAGS & DUST		SINTER PLANT	3.64 TONS	11-Apr-96	19090-3
FIBERGLASS AND DEBRIS		NORTH END	28.1 TONS		COMERCIAL REFUGE
CLEAN-UP MATERIAL	13-May-96	NORTH END	31.44 TONS	16-May-96	19120-3
		41972-220556			
BOILER HOUSE DUST				30-May-96	19132-3
PAD EXCAVATION	20-May-96	NORTH END		30-May-96	19130-3
SAND FILTER MEDIA	20-May-96	123 QUENCHER		30-May-96	19131-3
CRUDE COAL TAR SPILL	29-May-96	NORTH END	133 TONS	30-May-96	16734-3

HAZARDOUS AND NON-HAZARDOUS MATERIALS STORED ON SITE

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[illegible]



DEPARTMENT OF COMMERCE, LABOR & ENVIRONMENTAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

1304 Goose Run Road
Fairmont, WV 26554-1390

Gaston Caperton
Governor

John M. Ranson
Cabinet Secretary

David C. Callaghan
Director

Ann A. Spaner
Deputy Director

April 12, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Certified # Z 121 400 740

Wheeling Corrugating Company
Beech Bottom Plant
Beech Bottom, WV 26030
Attention: Jim Howell

Dear Mr. Howell:

Enclosed is a copy of the **Compliance Evaluation Inspection (CEI) Report** completed on your facility by representatives of the Chief from the Office of Waste Management. This report is based on the inspection conducted on February 22, 1994.

Accompanying this report you will find a **Notice of Violation (NOV)** for those violations detected during the course of this inspection. A copy of this NOV has been forwarded for penalty calculations by the Assessment Officer. In addition, the Civil and Administrative Enforcement Unit of this Office and the United States Environmental Protection Agency have been notified so that these violations have become a permanent addition to the compliance history of this facility.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or the attached report, please feel free to contact this office at (304) 367-2724.

Sincerely,

Stanley J. Moskal
Inspector Supervisor - Northern Unit
Compliance Monitoring/Enforcement
Office of Waste Management

SJM:st

Enclosures

cc: Assessment Office for Civil Penalties
Jeanne Sofield, U.S. EPA Region III
Civil and Administrative Enforcement Unit
Pamela S. Lyons, Inspector
RCRA File
CME File, Charleston

EVALUATION - VIOLATION - ENFORCEMENT FORM

Handler ID Number	Handler Type	Date Submitted
W:V D 0 0 0 7 9 7 7 2 0	LDF[] TSF[] INC[] LQG[X] SQG[] TRA[]	
Handler Name		
Wheeling Corrugating (Div. of Wheeling Pittsburgh Steel Corp.) Beech Bottom		
Street	City	
Route 2	Beech Bottom, WV 26030	

EVALUATION	Add <input checked="" type="checkbox"/>	Change	Delete
Date	Number	Agency	Type
0 2 2 2 9 4		S	C E I
Reason	Branch	Person	
	C M	P S L	

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

GER	GPT	TGR	DCH	DGW	DMC	DPP	CAS
GGR	GRR	TMR	DCL	DIN	DMR	DSI	FEA
GLB	GSC	TOR	DCP	DLB	DOR	DTR	CSS
GMR	GSQ	TRR	DFR	DLF	DOT	DTT	
GOR	GEX	TWD	DGS	DLT	DPB	DWP	

Comments

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION	Add <input checked="" type="checkbox"/>	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type
S		G P T	1	S R
40 CFR 265.173.a refer 47 CSR 35.6.5.c.1.B				
Date Determined	Priority	Branch	Person	Returned to Compliance
0 2 2 2 9 4	4	C M	P S L	Scheduled Actual
0 3 1 0 9 4				
Comments Satellite Accumulation Drum - Open Drums				

VIOLATION	Add <input checked="" type="checkbox"/>	Change	Delete	Link to Above Evaluation? (Y/N)
Agency	Number	Area	Class	Regulation Type
S		G P T	1	S R
47 CSR 35-6.3.5.c.1.B				
Date Determined	Priority	Branch	Person	Returned to Compliance
0 2 2 2 9 4	4	C M	P S L	Scheduled Actual
0 3 1 0 9 4				
Comments Satellite Accumulation - Drum not marked with words "Hazardous Waste"				

☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA

INSPECTION FACT SHEET

COMPANY NAME: Wheeling Corrugating Company
(Division of Wheeling-Pittsburgh Steel)

I.D.#: WVD000797720

MAILING ADDRESS: Beech Bottom Plant
Beech Bottom, West Virginia 26030

TYPE OF FACILITY: Large
Quantity Generator

LOCATION: Route 2
Beech Bottom, WV

COUNTY: Brooke (009)

COMPANY CONTACT: Jim Howell

HANDLING CODES: S01

PHONE: (304) 234-4223

PURPOSE: Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E;
West Virginia Administrative Regulations for Chapter 20-5E;
and/or 40 CFR Parts 260 thru 268

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)

D001 F003

D005 F005

D006

___ DETERMINATION PENDING

D007

D008

___ NOT APPLICABLE

D018

D035

XX VIOLATIONS

D039

___ NO VIOLATIONS

DATE INSPECTED: February 22, 1994

INSPECTOR: (1) Pamela S. Lyons, West Virginia Division of Environmental Protection
Office of Waste Management, Wheeling Field Office

(2) James A. Gaston, West Virginia Division of Environmental Protection,
Office of Waste Management, Wheeling Field Office

(3) Mark Kees, West Virginia Division of Environmental Protection,
Office of Waste Management, Charleston

DATE PREPARED: February 25, 1994

PREPARED BY: Pamela S. Lyons, Office of Waste Management

COMPLIANCE EVALUATION INSPECTION

RE: Wheeling Corrugating Company, Beech Bottom
(Division of Wheeling Pittsburgh Steel Corporation) WVD000797720

DATE INSPECTED: February 22, 1994

INSPECTORS: Pamela S. Lyons, West Virginia Division of Environmental Protection,
Office of Waste Management, Wheeling Field Office

James A. Gaston, West Virginia Division of Environmental Protection,
Office of Waste Management, Wheeling Field Office

Mark Kees, West Virginia Division of Environmental Protection,
Office of Waste Management, Charleston

DATE PREPARED: February 25, 1994

PREPARED BY: Pamela S. Lyons, Office of Waste Management

On February 22, 1994 at approximately 09:25 hours the above referenced inspectors conducted a Compliance Evaluation Inspection of the Wheeling Corrugating Company, Beech Bottom. Wheeling Corrugating Company is a Division of Wheeling Pittsburgh Steel Corporation. Upon our arrival we were met by Jim Howell, who had not previously been advised of our intention to inspect the facility.

Upon presentation of the appropriate credentials, the company official was informed of our authority as representatives of the Chief of the Office of Waste Management pursuant to Chapter 20 of the Code of West Virginia and as specified by Section 3007(a) of the Resource Conservation and Recovery Act; and Mr. Howell acknowledged our authority. The company official was informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgated thereunder.

This facility manufactures corrugated steel from coiled steel. It also coats coiled steel with primer and finish paint prior to it being corrugated at this facility and other Wheeling Pittsburgh Steel's corrugating plants. Some galvanized rolls are corrugated only. This facility is considered in the hazardous waste category for Large Quantity Generators.

The hazardous waste generated at this facility is from these sources: Used paint rags from the paint line (listed for D001-Ignitable, D005-Barium, D006-Cadmium, D007-Chromium, D008-Lead, and F005/D035-Methyl Ethyl Ketone, used as a solvent); waste petroleum naptha from parts cleaners (D001 - Ignitable, D018- Benzene, D039-Tetrachloroethylene); chrome contaminated waste from periodic cleanup (D007-Chromium); waste solvents from paint operation (D001-Ignitable; F003-Spent Xylene used as a solvent, and F005-Spent Toluene used as a solvent); and a one-time waste generation of gasoline from an UST closure (D001-Ignitable and D018-Benzene).

Waste streams that are no longer "hazardous" are the wastewater treatment sludge and the roll grindings. The wastewater treatment sludge was previously listed for chromium (D007). Prior to the last CEI (January 7, 1992), the analysis conducted on the wastewater treatment sludge had below levels of heavy metals. The roll grindings had been hazardous waste due to the lead (D008). The lead was contained in the adhesive of the rubber, which cover the rolls along the process line. Mr. Howell contacted the companies that re-coat the rolls with rubber to have a no-lead containing adhesive used in the re-coating process. All of the rolls of the facility were re-coated with the no-lead adhesive, in order that this waste stream be eliminated. Mr. Howell is to send this inspector a copy of his letter to the contracted companies and their response/confirmation.

The used paint rags and filters go to Ecolotec, Inc., in Dayton, Ohio for disposal by incineration, as do the waste paint and contaminated chrome waste. Michigan Recovery Systems, Inc., of Romulus, Michigan accepts the waste solvent from approximately seven (7) parts cleaners throughout the facility on a three (3) week schedule. The generated waste from the UST closure was a one-time event and was sent to Petromax, Ltd., of Carnegie, Pennsylvania.

The facility inspection began at the Hazardous Waste Storage Building (i.e., Building 15-see plant layout-Attachment B). Waste oil and the containers of used paint rags are stored in this building. There were eight (8) drums of hazardous waste in storage at the time of our inspection. The drums were numbered to assist in the tracking system set up at this site. Drum #203 contained paint rags and was dated "11-23-93."

The Storage Building was in better shape than at the time of the last inspection. The oil drums were in rows of two (2) with aisle space between each row. The hazardous waste drums were in a single row. Oil was noted around the oil drums and on top of some of the drums. Mr. Howell explained that there is no heat in Building 15. So during the very cold weather in January, some oil drums froze and expanded. Some of the freezing drums had developed leaks. Floor dry was used as a sorbent over most of the floor.

Jim Howell stated that the hazardous waste transporter was scheduled to pick up the accumulated drums on the day following the inspection (2-23-94). Mr. Howell had made these arrangements due to the threat of a union strike to start at the facility at the end of the week. He had stated that Drum #203 was dated wrong due to the fact that he had shipped out a load after that date. He assumes that an employee dated a drum at the satellite accumulation area when accumulation began. (Satellite accumulation is different than the Storage Building.)

On February 23rd, this inspector contacted Mr. Howell to clarify the waste streams and the hazardous waste codes assigned. Mr. Howell informed this inspector that the drums of hazardous waste were picked up by the transporter that morning.

CEI (Wheeling Corrugating Company)

February 25, 1994

Page three

After viewing the Hazardous Waste Storage Building, the plant operation was viewed. The paint lines were viewed, with the hazardous waste generation points noted. The paint line process is as follows: The steel coil is unwound, then runs through tension. The coil then goes through the cleaning tank. For galvanized coils, zinc phosphate is also added to the cleaning mixture. Once cleaned, the coil is prep-coated with chromium solution and dried. Then a primer coat is applied onto both sides of the coil. It is dried again prior to the finish coat being applied. After the finished coat, it is dried and recoiled.

While at the chromium application station, a drum labeled as containing hazardous waste was noted (see photo #1). Mr. Howell explained that the facility recycles the bulk of their chrome waste, but periodically the chrome application station needs cleaned out. The drum contained approximately two (2) inches of chromium waste from the last cleanup. According to Mr. Howell, the drum is stored in the Satellite Accumulation Storage Room until a cleanup is needed. At the time of our inspection, there were no workers at the chrome application station. The drum ring was on the floor near the drum. Since this drum is a satellite accumulation drum, there is no accumulation date required until the drum is filled. According to Mr. Howell, there are approximately four (4) drums of this chrome clean-up waste generated per year.

At the Primer Coating paint room, a drum of accumulating used paint rags was noted. The drum was not marked as "hazardous waste" nor was the contents noted. Also, the drum ring was not secured on the drum (see photo #2).

According to Mr. Howell, the S.O.P. for handling of used paint rags is: the used paint rags are to be taken to the Satellite Accumulation Storage Room at least once during the turn. In this room, a drum that contains a drain basket is located. The paint room operators are to place the used paint rags in the drain basket and replace the lid. The solvent drains out of the rags and into the bottom of the drum. The accumulated solvent is reused for cleaning the paint rooms and Satellite Accumulation Room. Once the satellite accumulation drum of used paint rags is full, the drum is painted black and then labeled and dated. It is then moved out to the Hazardous Waste Storage Building.

The used solvent is stored in the paint storage room until it is reused. Mr. Howell stated that it is stored there since that room has a sprinkler system. When the used solvent becomes spent, Mr. Howell will declare it waste and the drums labeled and dated.

Photo #3 shows the drain drum and satellite accumulation drum in the Satellite Accumulation Room. The satellite accumulation drum was not closed (i.e., the drum ring is not on). Both of the drums were labeled but not dated. The drain drum should not have been labeled. Photo #4 shows a third (3rd) drum in the Satellite Accumulation Room. It was labeled

but not dated. According to Mr. Howell and an area supervisor, this drum contained the used solvent, which was to be reused. After discussing the regulations of satellite accumulation and clarification of the procedure in practice, Mr. Howell removed the incorrect labels off the drain drum and used solvent drum. It was noted that S.O.P.s for the Satellite Accumulation Room drum handling were posted on the wall inside of the Satellite Accumulation Room.

The Finish Coat paint room was adjacent to the Satellite Accumulation Room. There were no drums of accumulating used paint rags present.

One of the parts cleaners located throughout the facility was viewed. Safety-Kleen maintains the parts cleaners on a three (3) week schedule. No extra drums of Safety-Kleen's solvent are left on-site. The only person handling this waste stream is to be the Safety-Kleen employee.

The above mentioned OWM employees went to Mr. Howell's office to view the records. One change in the record keeping has been that Mr. Howell has been keeping all of the records on-site, since January 1993. In the past, the original records were kept at the Wheeling Pittsburgh Steel's Corporate Office in Wheeling.

The hazardous waste manifests for 1993 and 1994 were viewed. See Attachments C, D, E and F - representative examples of manifests. The manifests with Land Disposal Restriction Forms were found in order. **Note:** Attachment F represents hazardous waste generated from a gasoline UST closure. Attachment E represents a shipment to Safety-Kleen's New Castle, Kentucky site. Mr. Howell stated that this waste was generated during a special cleanup of the paint line when some of the old machinery was moved.

The facility conducted its annual hazardous waste training for 1993 on November 17th. See Attachment G - the sign-in sheet and proposed attendees from the Beech Bottom plant. Clean Harbors conducted the training for Wheeling Pittsburgh Steel employees in the upper Ohio Valley region during a two (2) week period.

A copy of the Contingency Plan was requested to be viewed. The ring binder presented contained the BMP, SPCC, MSDSs, RCRA Contingency Plan and other documents. The 1992 revision of the Contingency Plan is Attachment H. The Contingency Plan does not include all of the required information of all emergency equipment or for the evacuation plan. The Contingency Plan has not been amended to reflect a change in the list of emergency coordinators. The facility has a new plant manager (Dave Kerns) as of January 1994. The Plan is focused on the Hazardous Waste Storage Building (i.e., Building 15). It does not address the Satellite Accumulation Room, or the Paint Storage Room where the waste solvent would be stored. The Contingency Plan needs to reflect the generation/accumulation and storage sites for spill, fire and evacuation procedures.

Under the Preparedness and Prevention Requirements in Subpart C of 40 CFR 265 and the Contingency Plan Regulations, the arrangements made with local authorities need to be better clarified. The primary emergency responder needs to be designated for the police and fire departments. Also, which of the local hospitals have been familiarized with the properties of the hazardous waste handled at the facility and types of injuries or illness could result from fires, explosions or release at the facility.

After a brief exit discussion, the above mentioned OWM employees thanked Mr. Howell for his cooperation and departed.

VIOLATIONS

1. This facility did not maintain containers holding hazardous waste as a closed container during storage. Waste was not being added or removed from the drum at the time of the violations being noted at the Primer Coat Paint Room, by the Chromium Application Station prior to cleanup activities, and at the Satellite Accumulation Room. These incidents are in violation of 40 CFR 265.173(a) as referenced by 47 CSR 35-6.3.5.c.1.A.
2. This facility did not have a drum containing hazardous waste (used paint rags) marked with the words hazardous waste or noting the contents. This drum was located in the Primer Coat Paint Room, in violation of 47 CSR 35-6.3.5.c.1.B.
3. The facility's Contingency Plan did not include all of the required information for all of the emergency equipment. The emergency equipment is to include the fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment. The Plan must include the location and physical description of each item on the list and a brief outline of its capabilities. This is according to 40 CFR 265.52.e. as referenced by 47 CSR 35-6.3.5.a.5.
4. The evacuation plan in the Contingency Plan for this facility does not address the generation and satellite accumulation/storage sites nor describes the signal(s) to be used to begin evacuation or the evacuation routes to be used. This is required in 40 CFR 265.52.f. as referenced in 47 CSR 35-6.3.5.a.5.

CEI (Wheeling Corrugating Company)

February 25, 1994

Page Six

5. The arrangements with local authorities that would respond to an emergency at this facility are not clearly defined as is required in 40 CFR 265.37 and 40 CFR 265.52.c. as is referenced by 47 CSR 35-6.3.5.a.5.

CONCLUSION

The above noted violations will be addressed by a notice of Violation. Violations #1 and #2 are to be referred to the Enforcement Section. Violations #3-5 are to be addressed by the facility within the time frame noted on the Notice of Violation or other enforcement actions may be pursued.

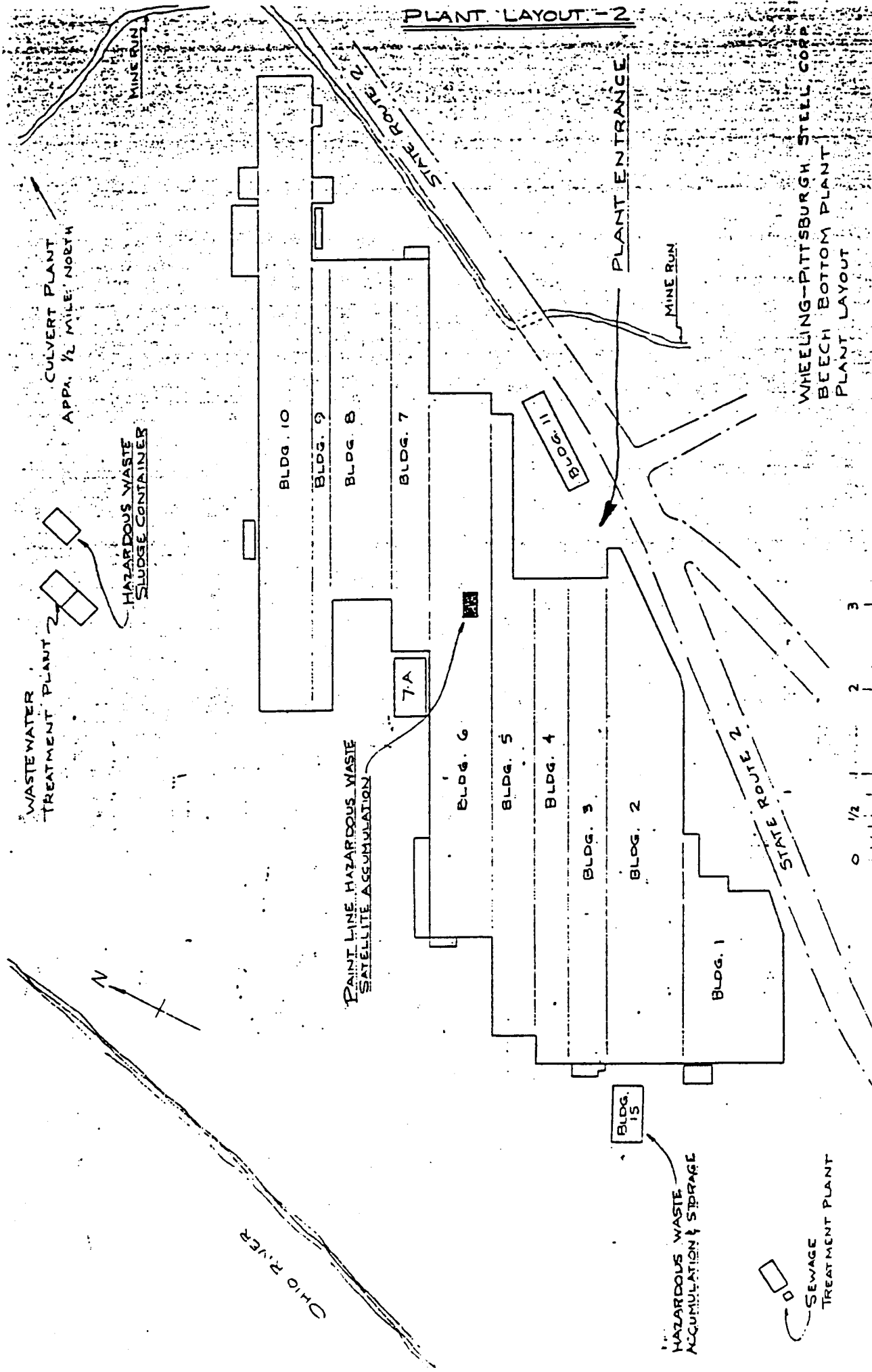
BEECH BOTTOM PLANT
WHEELING PITTSBURGH
WVD000797720

TILTONSVILLE, OHIO-W. VA.

N4007.5—W2037.5/7.5

1968
PHOTOREVISED 1973
AMS 4864 II NW-SERIES 4854

PLANT LAYOUT - 2



Facility Name: *Wheeling Corrugating Company (Div. of Wheeling Pittsburgh)*

[illegible]

Film Description: *Kodacolor 200*

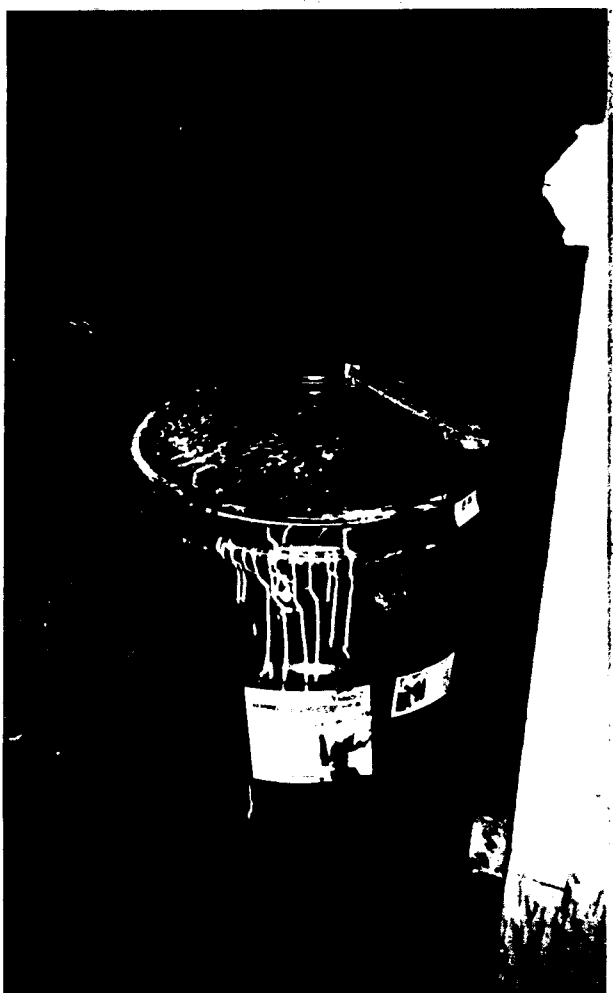
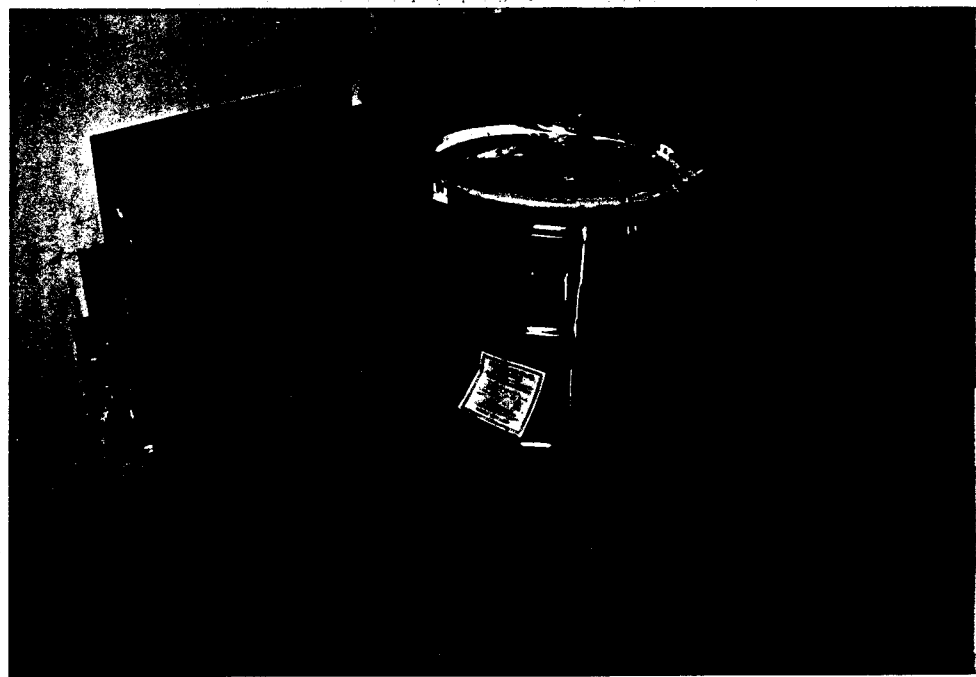
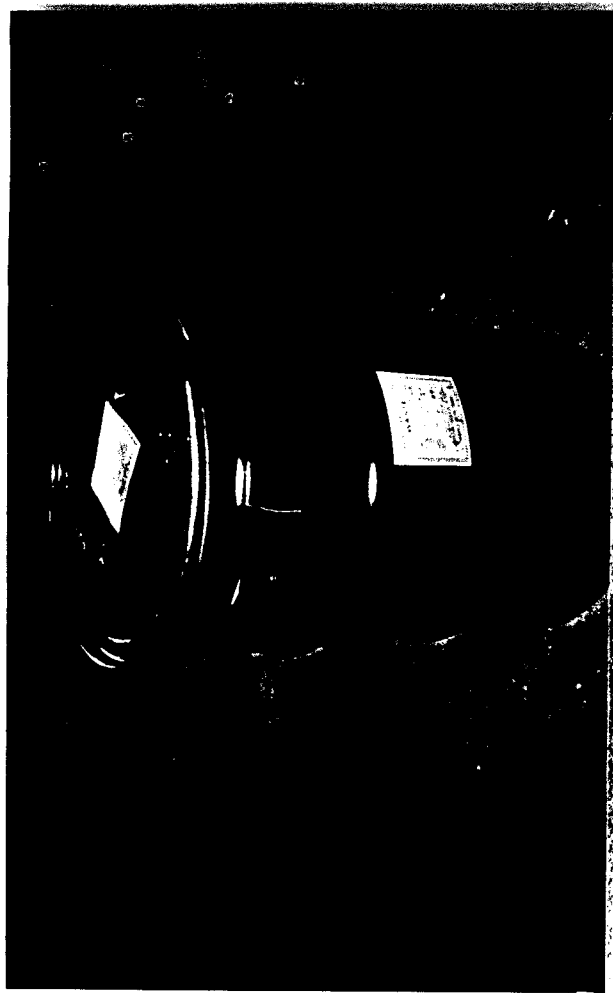
Focal Length of Lens:

Date Photos Taken: February 22, 1994

Photographer: *Pamela S. Lyons.*

Developer: *Kramers Photo Supply, Inc.*

Log Prepared By: *Pamela S. Lyons*



Feb. 22, 1994
29.56 hours
Wheeling Corrugating Company
Beach Bottom
Brooke County, WV
RSL

hours
ing Corrugating Company (W-P)
Beach Bottom
Brooke County, WV

22, 1994

hours
ing Corrugating Company (W-P)
Beach Bottom
Brooke County, WV

#2

February 22, 1994

10:11 hours

Wheeling Corrugating Company (W-P)

Beach Bottom

Brooke County, WV

RSL



Gaston Caperton
Governor

John M. Ranson
Cabinet Secretary

DEPARTMENT OF COMMERCE, LABOR & ENVIRONMENTAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION
Office of Waste Management

David C. Callaghan
Director

Ann A. Spaner
Deputy Director

NOTICE OF VIOLATION

DATE: February 22, 1994

TIME: 09:25

ISSUED TO: Wheeling Corrugating Company (Division of Wheeling Pittsburgh Steel Corporation)

EPA ID#: WVD000797720

FACILITY MAILING ADDRESS: Beech Bottom Plant, Beech Bottom, WV 26030

FACILITY REPRESENTATIVE: Jim Howell

On the date and time specified, an authorized agent of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 20, Article 5E and/or an Order or Permit issued pursuant to §20-5E. During that inspection the following violation(s) were noted:

- #3 ~~1~~. A. (Regulation) 40 CFR 265.52.e as referenced by 47 CSR 35-6.3.5.a.5
B. (Facts) This facility's Contingency Plan does not include all of the required information for all of the emergency equipment., including location, capabilities & description.
- #4 ~~2~~. A. 40 CFR 265.52.f as referenced by 47 CSR 35-6.3.5.a.5
B. This facility's Contingency Plan's Evacuation Plan does not address the generation and satellite accumulation sites nor describes the evacuation signal(s) to be used.
- #5 ~~3~~. A. 40 CFR 265.37 & 265.52.c as referenced by 47 CSR 35 - 6.3.5.a.5
B. The arrangements with local authorities which would respond to an emergency situation at this facility is not clearly defined.

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial actions:

This facility must comply with the West Virginia Hazardous Waste Management Regulations. The Contingency Plan needs to be revised to show the accurate Emergency Coordinators; the complete information of the emergency equipment; the expanded details of the evacuation plan to include the generation & satellite accumulation sites and the signals used to begin an evacuation; and clarify / document the arrangements made with local authorities.
By May 1, 1994, this facility is to send the revised Contingency Plan to this inspector to the Wheeling Field Office (303 Methodist Building, Wheeling, WV 26003). Violations # 1 & #2 are addressed on Page 1 of this Notice of Violation.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §20-5E-16(a).

Field Office
District Phone: (304) 238-1075

Fax: (304) 238-1006

Issued By: 

Title: Environmental Inspector

Gaston Caperton
GovernorJohn M. Ranson
Cabinet SecretaryDEPARTMENT OF COMMERCE, LABOR & ENVIRONMENTAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION
Office of Waste ManagementDavid C. Callaghan
DirectorAnn A. Spaner
Deputy Director**NOTICE OF VIOLATION**DATE: February 22, 1994TIME: 09:25ISSUED TO: Wheeling Corrugating Company (Division of Wheeling Pittsburgh Steel Corporation)EPA ID#: WVD000797720FACILITY MAILING ADDRESS: Beech Bottom Plant, Beech Bottom, WV 26030FACILITY REPRESENTATIVE: Jim Howell

On the date and time specified, an authorized agent of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 20, Article 5E and/or an Order or Permit issued pursuant to §20-5E. During that inspection the following violation(s) were noted:

1. A. (Regulation) 40 CFR 265.173(a) as referenced by 47 CSR 35 - 6.3.5.c.1.A
B. (Facts) This facility does not maintain drums of hazardous waste as a closed container during storage. Waste was not being added or removed at the time of violations noted.
2. A. 47 CSR 35-6.3.5.c.1.B
B. A drum containing hazardous waste was not marked with the words "Hazardous Waste" or noting the contents.
3. A. See Page 2 for violations concerning the Contingency Plan.
B.

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial actions:

This facility must comply with the West Virginia Hazardous Waste Management Regulations. Regarding the above two mentioned violations, this facility is to correct these violations by March 10, 1994. Drums of hazardous waste when in storage or satellite accumulation are to be kept closed (i.e., drum ring on and tighten down) except when waste is being removed or added. Drums containing hazardous waste must be marked as such or with the contents noted. This facility is to document the actions taken to correct the violations and send a copy of the documentation to the Wheeling Field Office. The address is: WV DEP OWM; Wheeling Field Office, 303 Methodist Building, Wheeling, WV 26003 Attention: Pam Lyons.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §20-5E-16(a).

Field Office (304) 238-1075
District Phone: Fax: (304) 238-1005Issued By: Pamela A. LyonsTitle: Environmental Inspector

Division of Environmental Protection
Office of Waste Management

Civil Administrative Penalty
Referral Form

Facility: Wheeling Corrugating Company (Div. of Wheeling-Pittsburgh)
Location: Beech Bottom, WV
EPA Id #: WVD000797720
Citation: 47 CSR 35-6.3.5.c.1.B
Date of NOV: February 22, 1994

I) Deviation from Requirements

- (1-3) 2 The violator had completed nearly all requirements in question. However, there were some aspects of the requirement which were clearly not accomplished. Or, the requirement was complete in most, but not all, areas of the facility.
- (4-6) _____ The violator had completed approximately one-half of the requirement of the regulation in question. Or, the requirement was completed in approximately one-half of the areas of the facility.
- (7-9) _____ The violator has completed almost none of the requirements of the regulation in question. However, some aspects of the requirements clearly were accomplished. Or, the requirement was incomplete in most but not all areas of the facility.
- (10) _____ The violator had not completed any of the requirements of the regulation in question. Or, the requirement was incomplete in all areas of the facility.
-

II) Potential for Harm

- (1-3) 3 Violation is of an administrative nature and could not result in a potential for harm to human health or the environment.
- (4-6) _____ Violation is of an administrative or physical nature and may result in a minor potential for harm to human health or the environment.
- (7-9) _____ Violation is of administrative or physical nature and may result in a moderate potential for harm to human health or the environment.
- (10) _____ Violation is of an administrative or physical nature and may result in a major potential for harm to human health or the environment.
-

Complete the back of this page.

III) Negligence/Good Faith

- (1) _____ The violation is not the result of negligence and the violator expended all possible effort to comply with the requirements in question or the violator has completed all actions to correct the violation.
- (2-4) 2 The violation is the result of an oversight by the violator and could have been avoided if a more conscientious effort had been made in the operation of the facility, Or the violator has begun but not completed current actions to correct the violation.
- (5-7) _____ The violation is obvious and a result of a lack of reasonable care by the violator, Or the violator has taken inadequate action to correct the violation.
- (8-10) _____ The violation is the result of a complete disregard for the requirement in question, Or the violator failed to respond to previous enforcement action, pertaining to the same requirement.
-

IV) Type of Facility

_____ Conditionally Exempt SQG X Generator
_____ Small Quantity Generator _____ Permitted TSD
Adjustment Factor 1.0

V) History of Non-Compliance

0 Number of Final Administrative Orders
0 Number of Civil Actions
0 Number of Criminal Convictions

Division of Environmental Protection
Office of Waste Management

Civil Administrative Penalty
Referral Form

Facility: Wheeling Corrugating Company (Div. of Wheeling-Pittsburgh)
Location: Beech Bottom, WV
EPA Id #: WVD000797720
Citation: 40 CFR 265.173(a) as referenced 47 CSR 35-6.3.5.c.1.A
Date of NOV: February 22, 1994

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- (4-6) 4 The violator had completed approximately one-half of the requirement of the regulation in question. Or, the requirement was completed in approximately one-half of the areas of the facility.
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IV) Type of Facility

_____ Conditionally Exempt SQG X Generator
_____ Small Quantity Generator _____ Permitted TSD
Adjustment Factor 1.0

V) History of Non-Compliance

0 Number of Final Administrative Orders
0 Number of Civil Actions
0 Number of Criminal Convictions

MICHIGAN DEPARTMENT
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Please print or type.

Failure to file is punishable under
Section 299.548 MCL or Section 10 of
Act 188, P.A. 1989.

Form Approved. OMS No. 2050-0039 Expires 9-30-01

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

WV D 0 0 0 7 4 1 7 2 6 6 9 9 2

Manifest Document No.

2. Page 1

Information in the shaded areas
is not required by Federal
law.

3. Generator's Name and Mailing Address

WHEELING-PITTSBURGH STEEL CORP.
ROUTE 2, BEECH BOTTOM, WV 26030

A. State Manifest Document Number

MI 2469026

4. Generator's Phone (304) 234-7628

B. State Generator's ID

5. Transporter 1 Company Name

DRURY BROTHERS INC.

6. US EPA ID Number

MI D 0 5 6 9 8 2 8 9 2

C. State Transporter's ID

D. Transporter's Phone 313-9623224

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

MICHIGAN RECOVERY SYSTEMS INC.
36345 VAN BORN ROAD
ROMULUS, MICH. 48174

10. US EPA ID Number

MI D 0 6 0 9 7 5 8 4 4

G. State Facility's ID

H. Facility's Phone

313-326-3100

11. US DOT Description (including Proper Shipping Name, Hazard Class, and
HM ID NUMBER).

12. Containers

No.

Type

13. Total

Quantity

14. Unit

Wt/Vol

15. Waste

No.

N/H

a. **X** RQ, Waste Paint Related Material (Xylene, Toluene)
Class 3, UN 1263 PG II (RQ 1001b)

0 8 0

D R

0 4 0 0 0

G

7 0 0 5

Z D 0 3

R

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

11a. RQ 100 LB (F003, F005, D001)

MRSI APPROVAL # 050542 D

IF UNDELIVERABLE: return to generator

HAZARDOUS WASTE RESTRICTED FROM LAND DISPOSAL UNDER 40 CFR 268

K. Handling Codes for Wastes

Listed Above

a/ 1

b/ 1

c/ 1

d/ 1

15. Special Handling Instructions and Additional Information

LAND DISPOSAL RESTRICTION FORMS ATTACHED ERG #27 attached 24hour emergency # 304-234-7628

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by
proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway
according to applicable international and national government regulations.If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined
to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the
present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste
generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Date

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in
Item 19.

Printed/Typed Name

Signature

Date

Month Day Year

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE
CENTER AT 1-800-424-8802 24 HOURS PER DAY.

MICHIGAN RECOVERY SYSTEMS, INC.

Generator WHEELING PITTSBURGH STEEL CORP
 Manifest Doc. # 69026
 Manifest Line Item #: KY11a. () 11b. () 11c. () 11d.

EPA I.D.#: WVD 000 797 720
 EPA Waste Code: F003, F005, D001

Notification of Hazardous Waste Restricted from Land Disposal

F001-F005 Solvent Wastes

Wastes which do not meet treatment standards: Notification from generator to disposal facility [40 CFR 268.7(a)(1)(i)]

The wastes identified on the above mentioned manifest and bearing the above mentioned EPA Hazardous Waste Number(s) are subject to the land disposal restrictions of 40 CFR Part 268. This waste does not meet the applicable treatment standards specified in Part 268 Subpart D or exceeds the prohibitions specified in 268.32 or RCRA section 3004(d). Analytical data, where available has been previously supplied or is attached. All treatment standards or prohibition levels exceeded by the waste are checked below:

1. Applicable treatment standards from 40 CFR 268.41 (Table CCWE) or 268.42 (Tables 1 and 2) or 268.43 (Table CCW)

Hazardous Waste	Constituents of Concern	Nonwastewater		Wastewater Total Composition mg/l	Check (if applicable)
		Total Composition mg/kg	TCLP mg/l		
F001 - Spent halogenated solvents used in degreasing	Carbon tetrachloride	5.6		0.057	
	Methylene chloride	3.3		0.089	
	Tetrachloroethylene	5.6		0.056	
	1,1,1-Trichloroethane	5.6		0.054	
	Trichloroethylene	5.6		0.054	
	1,1,2-Trichloro-1,2,2-trifluoroethane	28		0.057	
	Trichlorofluoromethane	33		0.02	
F002 - Spent halogenated solvents	Chlorobenzene	5.7		0.057	
	1,2-Dichlorobenzene	6.2		0.033	
	Methylene Chloride	33		0.089	
	Tetrachloroethylene	5.6		0.056	
	1,1,1-Trichloroethane	5.6		0.054	
	1,1,2-Trichloroethane	7.6		0.03	
	Trichloroethylene	5.6		0.054	
	1,1,2-Trichloro-1,2,2-trifluoroethane	28		0.057	
	Trichlorofluoromethane	33		0.02	
F003 - Spent non-halogenated solvents	Acetone	160		0.28	
	n-Butyl alcohol	2.6		5.6	
	Cyclohexanone		0.75	0.36	
	Ethyl acetate	33		0.34	
	Ethyl benzene	5		0.057	XXXXXXX
	Ethyl ether	160		0.12	
	Methanol		0.75	5.6	
	Methyl isobutyl ketone	33		0.14	
	Xylene	28		0.32	XXXXXXX
F004 - Spent non-halogenated solvents	Cresol (m and p isomers) and Cresylic Acid	3.2		0.77	
	o-Cresol	5.6		0.11	
	Nitrobenzene	14		0.068	
F005 - Spent non-halogenated solvents	Benzene	3.7		0.07	
	Carbon disulfide		4.81	0.014	
	2-Ethoxyethanol	Incineration		Bio. Degrad. or Incin.	
	Isobutanol	170		5.6	
	Methyl ethyl ketone	36		0.28	XXXXXXX
	2-Nitropropane	Incineration		Wet Oxid. or Chem Oxid then Carb. Adsorp./Incin.	
	Pyridine	16		0.014	XXXXXXX
	Toluene	28		0.08	XXXXXXX

2. California List Waste

This shipment contains hazardous waste subject to additional RCRA Section 3004(d) California List waste treatment standards.

- () Liquid waste with PCS's >50 ppm
- () Liquid hazardous waste that contain halogenated organic compounds (HOC) in total concentration > or = to 1,000 mg/l or 1,000 mg/kg (nonliquids). (INCINERATION) (HOCs found in 40 CFR 268.32 Appendix III).
- () Nickel (liquid waste) >134 ppm
- () Thallium (liquid waste) >130 ppm

3. Additional Hazardous Characteristics

- () No additional Hazardous Characteristics are exhibited by this waste which would require treatment beyond the standards described above.
- (X) Treatment standards for the additional Hazardous Characteristics requiring treatment are indicated below

TREATMENT STANDARDS FOR HAZARDOUS WASTE CHARACTERISTIC SUBCATEGORIES (40 CFR 268)

Check	Hazardous Waste Subcategories	Constituents of Concern	Total Composition mg/kg	Nonwastewater TCLP mg/l	Wastewater Total Composition mg/l
XXXXXXX	D001-Ignitable Liquids		INCMRFSUBS.RORGs.		N.A.
	High -TOC nonwastewater (>10% TOC)				
	D001-Ignitable liquids		DEACT		N.A.
	Low TOC nonwastewater (<10% TOC)				
	D001-Ignitable liquids wastewater (<1% TOC <1% TSS)		N.A.		DEACT
	D001-Ignitable compressed gases		DEACT		N.A.
	D001-Ignitable reactives		DEACT		N.A.
	D001-Oxidizers		DEACT		DEACT
	D002-Acidic Corrosives		DEACT		DEACT
	D002-Alkaline corrosives		DEACT		DEACT
	D002-Other corrosives		DEACT		DEACT
	D004-Arsenic	Arsenic		5	5
	D005-Barium	Barium		100	100
	D006-Cadmium	Cadmium		1	1
	D007-Chromium	Chromium(total)		5	5
	D008-Lead	Lead		5	5
	D009-Low-mercury (<250 mg/kg total Hg)	Mercury		0.2	0.2
	D009-High-mercury (>250 mg/kg total Hg)	Mercury with organics	IMERC.RMERC		0.2
		Mercury with inorganics	RMERC		0.2
	D010-Selenium	Selenium		5.7	1
	D011-Silver	Silver		5	5
	D012-Endrin	Endrin	0.13		INCIN.BIODG
	D013-Lindane	Lindane	0.066		INCIN.CARBN
	D014-Methoxychlor	Methoxychlor	0.18		INCIN.WETOX
	D015-Toxaphene	Toxaphene	1.3		INCIN.BIODG
	D016-2,4-D	2,4-D	10		INCIN.CHOXD.BIODG
	D017-2,4,5-TP Silvex	2,4,5-TP Silvex	7.9		INCIN.CHOXD

Company Name: WHEELING PITTSBURGH STEEL CORP

Authorized Signature: George M. Manning

Date: 01-14-94

Abbreviations of technology codes from 40 CFR 268.42:

INCIN (Incineration)
 FSUBS (Fuel substitution)
 RORGs (Recovery of organics)
 IMERC (Roasting/reforming of organics)
 RMERC (Incineration followed by
 roasting/reforming of ash)
 WETOX (Wet Air Oxidation)

DEACT (Deactivation to remove the characteristic)
 RTHRM (Thermal recovery)
 RLEAD (Thermal recovery of lead in secondary smelters)
 AMLGM (Amalgamation)
 BIODG (Biodegradation)
 CARBN (Carbon Adsorption)
 CHOXD (Chemical Oxidation)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address						A. State Manifest Document Number							
WHEELING-PITTSBURGH STEEL CORP ROUTE 2, BEECH BOTTOM, WV 26030						B. State Generator's ID							
4. Generator's Phone (304) 331-2345 OR (304) 234-7600						C. State Transporter's ID							
5. Transporter 1 Company Name						D. Transporter's Phone 304-233-6567							
6. US EPA ID Number						E. State Transporter's ID							
7. Transporter 2 Company Name						F. Transporter's Phone							
8. US EPA ID Number						G. State Facility's ID							
9. Designated Facility Name and Site Address						H. Facility's Phone							
SAFETY-KLEEN CORP 10 INDUSTRIAL PARK DRIVE WHEELING, WV 26002						304-233-6567							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <input type="checkbox"/> HM						No.		Type					
b. <input type="checkbox"/> WASTE PETROLEUM NAPHTHA COMBUSTIBLE LIQUID, UNICLASS						103		4		1953		DO01/ DO18/ DO39	
c. <input type="checkbox"/> (EPA IGNITABILITY, DO01) (ERG # 27)													
d. <input type="checkbox"/> This shipment contains hazardous waste which is restricted or prohibited from land disposal under 40 CFR 268. This waste is destined for beneficial recycle/reclamation under 40 CFR 261.2.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
I. L.						S02							
15. Special Handling Instructions and Additional Information 4-145-03 IF UNDELIVERABLE RETURN TO GENERATOR 7218 EMERGENCY RESPONSE PHONE# (708)-885-4660 7372 SKOOT # 11.A 501 MANIFEST CODE 8B54										NOTE: RETURN ORIGINAL TO : WHEELING-PITTSBURGH STEEL CORP RT. 2 BEECH BOTTOM PLANT BEECH BOTTOM, WV 26030 ATTN: J. HOWELL			
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name						Signature				Month Day Year			
DOMINIC MORANDO JR.						Dominic Morando Jr.				10/10/94			
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature				Month Day Year			
DAVE MORGAN						Dave Morgan				10/10/94			
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature				Month Day Year			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name						Signature				Month Day Year			
Rebecca Ciero						Rebecca Ciero				10/10/94			



1000 North Randall Road
Elgin, Illinois 60123-7857

ATTACHMENT FOR SERVICE CALL
D-2 TRANSPORTER
304-233-6567 ART INGLES
LOR REQ'D
2200+ CP
4-145-03-0165
WHEELING PITTSBURGH STEEL
ACCTS PAYABLE
1134 MARKET ST
WHEELING WV 26003

SCHEDULED SERVICE WEEK
93- 52

SCHEDULED SERVICE TERRITORY
12-02

REFERENCE NUMBER
793712

MANIFEST NUMBER
50161

4-145-03-7218-9
WHEELING PITTSBURGH STEEL
AT 2
BEECH BOTTOM
WV 26030

SERVICE DATE	SALESMAN'S NO.	SALES SPECIALIST	SALES TAX EXEMPTION NUMBER	HANDLING CODE	CREDIT CODE	PREVIOUS BALANCE	PORTION OVER 60 DAYS		
1-6-94	1161	XXXX	EXEMPT*94DP	15 S	N	4063.41	3117.51		
BUSINESS TYPE	CHAIN	CUSTOMER P.O. NUMBER	GENERATOR/CUSTOMER PHONE #	O.C.	SVC P/S	PROD. P/S	SERVICE TAX	C.O.M.S. TAX	PRODUCT TAX
09	NO	931004220	304-234-4259	NO	924	001	.06	.06	.06

MACHINE NUMBER	SERVICE CHARGE	SALES TAX	TOTAL CHARGE	SERVICE TERM	CHANGE SERVICE TERM	CHANGE SCHEDULE DATE	REMARKS	PLEASE CHECK CORRESPONDING BOXES
440-05369	148.75	.00	148.75	04			11000-3603000170	MACHINE CONDITION & CLEANLINESS
441-09255	163.41	.00	163.41	05			1	LAMP ASSEMBLY CONDITION
								DECALS IN PLACE AND LEGIBLE
								FUSIBLE LINK INSTALLED
								EMERGENCY CLOSING OF LID UNOBSTRUCTED
								MACHINE PROPERLY GROUNDED
								LOCAL PHONE NO. STICKER AFFIXED TO MACHINE
								SPEAK SOLVENT MEETS ACCEPTANCE CRITERIA

32
15
15
23

TOTAL SERVICE SECTION	312.16	312.16	GENERATOR USA EPA ID NO. WUC000797720	GENERATOR STATE ID NO. 49-025-0384
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CONTAINERS					USEPA TRANSPORTER ID# ILD984908202	I certify that my total waste streams are within one of the following categories: 0 to 220 lbs./month 220 lbs. to 2,200 lbs./month Greater than 2,200 lbs./month
PAILS NO. DM	SSPW TANKS OF	18 GAL. NO. DM	30 GAL. NO. DM	TOTAL LBS. OR GAL.	US DOT DESCRIPTION (INCLUDING PROPER SHIPPING NAME, HAZARD CLASS, AND ID.)	
			3	53	Waste Combustible Liquid, N.O.S. (Petroleum Naphtha) (IN GALLONS AND/OR 18 GAL. DRUMS) NA1993 PGIII (EPA, D001, D018, D039) (ERG #27)	
					RQ Waste Combustible Liquid, N.O.S. (Petroleum Naphtha) (IN GALLONS) 30 GAL. DRUMS NA 1993 PGIII (EPA, D001, D018, D039) (ERG #27)	
					RQ Waste Compounds, Cleaning Liquid, (Monoethanolamine) (IN GALS) PRODUCT NO. 699 NA1760 PGIII (EPA, D006, D007, D008, D018, D021, D027, D038, D040) (ERG #60)	

DESIGNATED FACILITY NAME AND ADDRESS: SAFETY-KLEEN CORP. 10 INDUSTRIAL PARK DRIVE WHEELING, WV 26003		USA EPA ID NO. WUC981034101 STATE ID NO.
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SOLD ON PREVIOUS SERVICES	PRODUCT NUMBER	DESCRIPTION	MSDS GIVEN	PRICE	U/M	QUANTITY DELIVERED	SALES AMOUNT	TAX	LINE TOTAL
2 PRIOR	PRIOR	LAST							
			<input type="checkbox"/>						
			<input type="checkbox"/>						
			<input type="checkbox"/>						
			<input type="checkbox"/>						
			<input type="checkbox"/>						
			<input type="checkbox"/>						
			<input type="checkbox"/>						
			<input type="checkbox"/>						
			<input type="checkbox"/>						

CASH <input type="checkbox"/>	TOTAL RECEIVED	APPLY PAYMENT TO:
CHECK NUMBER		<input type="checkbox"/> TODAY'S SERVICE/SALE <input type="checkbox"/> PREVIOUS BALANCE AS FOLLOWS
INV. #	AMOUNT \$	
INV. #	AMOUNT \$	
INV. #	AMOUNT \$	

TOTAL PRODUCT AMOUNTS	TOTAL SERVICE AMOUNT (FROM ABOVE)	TOTAL DUE
CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. THE RECLAMATION AGREEMENT, ADDITIONAL TERMS AND CONDITIONS, AND OTHER INFORMATION APPEARING ON THE REVERSE SIDE ARE MADE A PART HEREOF. THE ABOVE AMOUNT IS SUBJECT TO AN INTEREST CHARGE OF THE LESSOR OF 1 1/2% PER MONTH (18% PER ANNUM) OR THE MAXIMUM RATE ALLOWED BY LAW ON ANY UNPAID INVOICES THAT ARE NOT PAID WITHIN 30 DAYS.		
GENERATOR/DESIGNATED REPRESENTATIVE SIGNATURE		Print Name

IN EVENT OF EMERGENCY CALL
1-708-888-4660 (24 hours)

TO: SAFETY-KLEEN CORP.
(DESIGNATED FACILITY)EPA ID NO. WV0981034101
(DESIGNATED FACILITY)ADDRESS: 10 INDUSTRIAL DR, WHEELING, WV 26060

Under manifest number 50161, the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR Part 268.7, the generator hereby provides notice that the waste is restricted from land disposal. A copy of this form must be kept by the generator and facility for five (5) years from the date of waste shipment.

PLEASE CHECK THE APPROPRIATE BOXES	WASTE NAME	EPA* WASTE CODE	THE WASTE MAY CONTAIN THE FOLLOWING RESTRICTED CONSTITUENTS	TREATMENT STANDARD (mg/l) OR METHOD (FOR NON-WASTE WATER)
	<input checked="" type="checkbox"/> Waste Petroleum Naphtha (105)	D001, D018, D039	Ignitable Liquid (High TOC subcategory) Halogenated Organic Compounds (HOC's) \geq 1000 mg/l Benzene Tetrachloroethylene	Incineration (INCIN), fuel substitution (FSUBS) or recovery (RORGS) (40 CFR 268.42) (non-waste water) INCIN (40 CFR 268.42) (non-waste water) Not Established Not Established
	<input type="checkbox"/> Waste Petroleum Naphtha (140)	D001	Ignitable Liquid (High TOC Subcategory)	INCIN, FSUBS, or RORGS (40 CFR 268.42) (non-waste water)
	<input type="checkbox"/> Waste Petroleum Naphtha (sludges from Safety-Kleen Service Center Operations)	D001, D006, D007, D008, D039	All of the above, plus: — Cadmium — Chromium — Lead — Tetrachloroethylene	1.0 (non-waste water) 5.0 (non-waste water) 5.0 (non-waste water) Not Established
	<input type="checkbox"/> Waste Compound Cleaning Liquid/ Immersion cleaner 699	D006, D007, D008, D018, D021, D027, D039, D040	HOC's \geq 1000 mg/l — Cadmium — Chromium — Lead — Benzene — Chlorobenzene — 1, 4-Dichlorobenzene — Tetrachloroethylene — Trichloroethylene	INCIN (40 CFR 268.42) (non-waste water) 1.0 (non-waste water) 5.0 (non-waste water) 5.0 (non-waste water) Not Established Not Established Not Established Not Established
	<input type="checkbox"/> Waste Perchloroethylene	F002	Tetrachloroethylene	5.6 (non-waste water)
	<input type="checkbox"/> Waste Perc. Filters This hazardous debris is subject to the alternative treatment standards of 40CFR 268.45.	F002	Tetrachloroethylene	5.6 (non-waste water)
	<input type="checkbox"/> Waste Trichlorotrifluoroethane	F002	Trichlorotrifluoroethane	28.0 (non-waste water)
	<input type="checkbox"/> Waste 1,1,1 Trichloroethane	F002	1, 1, 1 Trichloroethane	5.6 (non-waste water)
	<input type="checkbox"/> Waste Petroleum Naphtha (Dry Cleaning)	D001, D039	Ignitable Liquid (High TOC Subcategory) Tetrachloroethylene	INCIN, FSUBS, or RORGS (40 CFR 268.42) (non-waste water) Not Established
	<input type="checkbox"/> Waste Paint Related Material	F003, F005, F003, F005, F003, F003, D001, D006, D007, D008	Acetone Methyl Ethyl Ketone Methyl Isobutyl Ketone Toluene Xylene Methanol Ignitable Liquid (High TOC Subcategory) Cadmium Chromium Lead (TOC Subcategory)	160.0 (non-waste water) 36.0 (non-waste water) 33.0 (non-waste water) 28.0 (non-waste water) 28.0 (non-waste water) 0.75 (non-waste water) INCIN, FSUBS, or RORGS (40 CFR 268.42) (non-waste water) 1.0 (non-waste water) 5.0 (non-waste water) 5.0 (non-waste water)
	<input type="checkbox"/> Waste Antifreeze	D008, D039	Lead Tetrachloroethylene	5.0 (non-waste water) Not Established

The constituent composition is based on knowledge of the waste (via Material Safety Data Sheets for the chemical(s) used, and the process which created the waste).
* These treatment standards do not preclude reclamation prior to final disposition.

Generator Company: WHEELING PITS - STEEL EPA ID NO.: WV000075573

Generator's Signature

Date:

1-6-97

Printed Name and Title of Generator

Dominic Morando Jr

Safety-Kleen Corp. manages the above waste through its recycling and fuels programs in accordance with all applicable elements of the land disposal restrictions.

PATROLMAN

GENERATOR

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-92

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. WVD 000797720		Manifest Document No. 66574		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address WHEELING PITTSBURGH STEEL 2 RT 2 BEECH BOTTOM Generator's Phone (304) 234-4223 WV 26030						A. State Manifest Document Number							
5. Transporter 1 Company Name SAFETY KLEEN CORP						6. US EPA ID Number ILD 984908202							
7. Transporter 2 Company Name						8. US EPA ID Number							
9. Designated Facility Name and Site Address SAFETY KLEEN CORP STATE HWY 146 NEW CASTLE, KY 40050						10. US EPA ID Number KYD 053348108							
						C. State Transporter's ID							
						D. Transporter's Phone (304) 233-6567							
						E. State Transporter's ID							
						F. Transporter's Phone							
						G. State Facility's ID							
						H. Facility's Phone 502-845-2453							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <input checked="" type="checkbox"/> RQ HAZARDOUS WASTE, SOLID, N.O.S. 9 NA3077 PG III (FO03)(ERG#31)						016 DM		07472		P		FO03 D007	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
RQ HAZARDOUS WASTE, SOLID, N.O.S. 9 NA3077 PG III (FO03)(ERG#31)						SOL/T50							
15. Special Handling Instructions and Additional Information 4-145-03-7218 PP/M66574 IF UNDELIVERABLE RETURN TO GENERATOR EMER RESP#708-888-4660 24HR SAMPLE#320759 CTL#0181831-3 SKDOT#A: 1195													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name JIM HOWELL						Signature Jim Howell						Date 08/13/93	
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature John A. Schutz						Date 08/13/93	
Printed/Typed Name JOHN A. SCHUTZ						Signature John A. Schutz						Date 08/13/93	
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature						Date	
Printed/Typed Name						Signature						Date	
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name Ellen Hamlin						Signature Ellen Hamlin						Date 08/17/93	

TO: SAFETY-KLEEN CORP EPA ID NO: KYD053348108
STATE HWY 146 NEW CASTLE KY 40050

Under manifest number 66574 line number 11A (enter 11a 11b, 11c, OR 11d) the generator noted below is shipping to you a waste determined to be restricted under 40 CFR Part 268. In accordance with 40 CFR 268.7, the generator hereby provides notice that the waste is restricted and the EPA waste code and the appropriate treatment standards are as follows:

EPA WASTE CODES: F003 D007 D006 D008

Regulated Hazardous Constituent	TREATMENT STANDARDS (total mg/l, except as noted by TCLP)			
	Wastewater W/Solvents	Check All That apply	All Other Solvent Wastes	Check All That Apply
Acetone	0.28	_____	160	_____
Benzene	0.07	_____	3.7	_____
N-Butyl alcohol	5.6	_____	2.6	_____
Carbon disulfide	0.014	_____	4.8	TCLP _____
Carbon tetrachloride	0.057	_____	5.6	_____
Chlorobenzene	0.057	_____	5.7	_____
Cresol (m- and p-isomers)	0.77	_____	3.2	_____
o-Cresol	0.11	_____	5.6	_____
Cyclohexanone	0.36	_____	0.75	TCLP _____
o-Dichlorobenzene	0.088	_____	6.2	_____
Ethyl acetate	0.34	_____	33	_____
Ethyl benzene	0.057	_____	6.0	_____
Ethyl ether	0.12	_____	160	_____
Isobutyl alcohol	5.6	_____	170	_____
Methanol	5.6	_____	0.75	TCLP _____
Methylene chloride	0.089	_____	33	_____
Methylene chloride(from Pharm. Industry)	0.44	_____	33	_____
Methyl ethyl ketone	0.28	_____	36	_____
Methyl isobutyl ketone	0.14	_____	33	_____
Nitrobenzene	0.068	_____	14	_____
Pyridine	0.014	_____	16	_____
Tetrachloroethylene	0.056	_____	5.6	_____
Toluene	0.08	_____	28	_____
1,1,1-Trichloroethane	0.054	_____	5.6	_____
1,1,2-Trichloroethane	0.03	_____	7.6	_____
1,1,2-Trichloro-1,2,2-trifluoroethane	0.057	_____	28	_____
Trichloroethylene	0.054	_____	5.6	_____
Trichloromonofluoromethane	0.02	_____	33	_____
Xylenes (total)	0.32	_____	28	X _____

California List Prohibited Wastes	Level (mg/l)	Treatment Standard	
Halogenated Organic Compounds	1000.0	Incineration*	_____
Nickel (Ni)	134.0	None	X _____
Thallium (TI)	130.0	None	_____
Chlorinated Biphenyls (PCB's)	50.0	Incineration	_____

* These treatment standards do not preclude solvent recovery or use as fuel prior to land disposal.

Waste Descriptions and/or Treatment Subcategory		Treatment Standards Reference in 40 CFR and Technology Codes for 40 CFR 268.42(a)		Check All That Apply
Waste code	Description	Wastewaters	Nonwastewaters	
D001:	Wastewaters (<1.0 wt% TOC and TSS)	268.42(a) DEACT _____	NA	
	Low TOC Ignitable Liquids (<10 wt% TOC)	NA	268.42(a) DEACT _____	
	High TOC Ignitable Liquids (>10 wt% TOC)	NA	268.42(a) RORGS, FSUBS, OR INCIN _____	
D002	Corrosives, all subcategories & CA list	268.42(a) DEACT _____	268.42(a) DEACT _____	
D004	Arsenic(As)	268.43(a) _____	268.41(a) _____	
D005	Barium (Ba)	268.43(a) _____	268.41(a) _____	
D006	Cadmium (Cd)	268.43(a) _____	268.41(a) _____	X _____
D007	Chromium (Cr)	268.43(a) _____	268.41(a) _____	X _____
D008	Lead (Pb)	268.43(a) _____	268.41(a) _____	X _____
D009:	Low Mercury Subcategory (<260 ppm Hg)	268.43(a) _____	268.41(a) _____	
	High Mercury Subcategory (>=260 ppm Hg)	268.43(a) _____	268.42(a) RMERC _____	
D010	Selenium (Se)	268.43(a) _____	268.41(a) _____	
D011	Silver (Ag)	268.43(a) _____	268.41(a) _____	
F005	2-Ethoxyethanol	268.42(a) INCIN* _____	268.42(a) INCIN* _____	
F005	2-Nitropropane	268.42(a) INCIN* _____	268.42(a) INCIN* _____	
Other Codes See attachment for supplemental list		_____	_____	

This hazardous debris is subject to the alternative treatment standards of 40 CFR 268.45 for the above contaminants that are subject to treatment. (check if applicable) _____

Generator Name: WHEELING PITT STEEL

EPA ID: WVD000797720

Generator Signature: [Signature]

Name & Title: JIM HOWELL Supt. W.C.C. ENVIRONMENTAL

Safety-Kleen Sample Number: 320759

Control Number: 0181831-3

NOTE: The USEPA has not determined treatment standards for the new TCLP EPA Waste Numbers: D018 through D043.



ATTACHMENT F-1

PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Waste Management

P. O. Box 8550

Harrisburg, PA 17105-8550

OFFICIAL PENNSYLVANIA MANIFEST FORM

FOR SHIPMENT OF HAZARDOUS, INFECTIOUS
AND CHEMOTHERAPEUTIC WASTE.

Form approved.

OMB No. 2050-0039

Expires 9-30-92

ER-WM-51 REV. 1/91

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DER (717) 787-4343

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. W V D 0 0 0 7 9 7 7 2 0 7 0 7 9 3	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law but is required by State law.	
3. Generator's Name and Mailing Address Wheeling-Pittsburgh Steel Corp Route 2 Beech Bottom, WV 26030		A. State Manifest Document Number PAC 7843813		B. State Gen. ID		
4. Generator's Phone (304) 234-2683		C. State Trans. ID PA- A H 0 1 0 9		D. Transporter's Phone (412) 279-9556		
5. Transporter 1 Company Name Petroclean, Inc.		6. US EPA ID Number P A D 0 9 8 4 3 1 8 8 5		E. State Trans. ID PA-		
7. Transporter 2 Company Name		8. US EPA ID Number		F. Transporter's Phone ()		
9. Designated Facility Name and Site Address Petromax, Ltd. 301 Prestley Street Carnegie, PA 15106		10. US EPA ID Number P A D 9 8 2 6 8 4 4 5 8		G. State Facility's ID 		
H. Facility's Phone (412) 279-9040		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		
a. RQ, Waste Gasoline, 3, UN1203, PGII		b. RQ, Combustible Liquid, n.o.s. (diesel fuel), 3, NA1993 PGIII		13. Total Quantity G		
c.		d.		14. Unit WL/Vol		
J. Additional Descriptions for Materials Listed Above Lab Pack Physical State Lab Pack Physical State		K. Handling Codes for Wastes Listed Above		15. Special Handling Instructions and Additional Information		
a. <input type="checkbox"/> L <input type="checkbox"/> I		b. <input type="checkbox"/> <input type="checkbox"/>		Material is gasoline and water from UST closure.		
b. <input type="checkbox"/> <input type="checkbox"/>		c. <input type="checkbox"/> <input type="checkbox"/>		Material is diesel fuel and water from UST closure. (Not RCRA regulated).		
c. <input type="checkbox"/> <input type="checkbox"/>		d. <input type="checkbox"/> <input type="checkbox"/>		EMERGENCY RESPONSE GUIDE #27		
d. <input type="checkbox"/> <input type="checkbox"/>		e. <input type="checkbox"/> <input type="checkbox"/>		In case of emergency contact Petroclean, Inc. (24hrs) 412/279-9556.		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.		17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Jim Howell		Signature Jim Howell		
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Gerald Ambler		Signature Gerald Ambler		
19. Discrepancy Indication Space		20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Ed W. L. Schaefer		Signature Ed W. L. Schaefer		

July 7, 1993

Mr. Kent Hart
Petromax, Ltd.
301 Prestley Street
Carnegie, PA 15106

Re: Land Disposal Restrictions

Wheeling-Pitt Steel Corporation

Dear Mr. Hart:

This is to notify you, pursuant to 40 CFR 268.7(a)(1), that the waste referenced below, shipped on manifest number PAC 7843813 is subject to land disposal restrictions specified at 40 CFR Part 268.

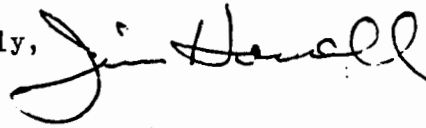
Manifest Line EPA Waste Code Treatability Group Standard Reference

11a D001 Ign Liq TOC>10% FSUBS 268.42 Table2

I believe this waste, and any residues resulting from the management of this waste, require treatment to meet applicable standards as set forth in 40 CFR Part 268, Subpart D, prior to land disposal. Applicable treatment standards are referenced above.

It is your responsibility to assure management of this waste is in compliance with all applicable conditions and restrictions imposed by law and regulation.

Sincerely,

 7-7-93

ATTENDEES (PROPOSED) ATTACHMENT G-1

HAZARDOUS WASTE TRAINING
CONDUCTED BY CLEAN HARBORS

4H064

LONG COURSE - NOV 17, 1993 - 9:00 AM - 1:00 P.M.

✓ WAYNE WILSON	COIL COATING
✓ RICH ROY	" "
VICTOR STERLING 11515	" OFF ON SICK LEAVE
✓ MARK O'LEARY	MAINTENANCE
✓ ERIC CHRONISTER	"
✓ JIM ROTH 11488	"
✓ RICK SNYDER 15476	"
✓ BOB WINESBURG 12748	"
SMITTY MYERS	LABELLE

21064

SHORT COURSE - NOV. 19, 1993 - 1:00 P.M. - 3: P.M.

BRIAN JONES	COIL COATING
ED SAMBUCCO	" "
ETHEL REID ok	PLANT PROTECTION
DOMINIC MORANDOK	" "
GEORGE MANNING ok	" "
MEL DICKENSON ok	" "
LEON FALCON Worked 8-4	" "
ED LISH 11486	MAINTENANCE
BOB GLOVER 12680	"
COATER ATTENDANTS	COIL COATING
UTILITY PERSONNEL	COIL COATING

HAZARDOUS WASTE Mgt

② HR Refresher

Beech Bottom Plant 11/19 - 1:00pm

Name

Signature

1	Hugh Whitehead ¹⁵⁷⁸³ ✓	Hugh Whitehead
2	RAYMOND L. TONER ¹⁵⁸⁹⁷ ✓	Raymond Toner
3	GEORGE MANNING ¹⁵⁴⁶⁷ ✓	George M. Manning
4	Ethel Reed ✓	Ethel Reed
5	John Lemons ¹⁵⁴⁶⁷ ✓	John E. Lemons
6	MEL DICKINSON ✓	Mel Dickinson
7	Ed Lish ¹¹⁴⁸⁶ ✓	Ed Lish
8	DOMINIC MORANDO JR ✓	Dominic Morando Jr.
9	GARY R. LYNCH ¹²⁹⁸⁴ ✓	Gary R. Lynch
10	RUSS NEFF ¹²²⁸² ✓	Russ Neff
11		
12		
13		
14		
15		

**WHEELING-PITTSBURGH STEEL CORPORATION
BEECH BOTTOM PLANT
HAZARDOUS WASTE CONTINGENCY PLAN**

REVISIONS - APRIL 8, 1992

Hazardous Wastes

The hazardous wastes at the Beech Bottom Plant are hazardous because of flammability and/or toxicity.

Hazardous wastes are generated at the coil coating line and include scrap paint, spent solvent/paint mixtures, solvent/paint contaminated wiping rags, solvent/paint cartridge or bag filters, and rubber drum lid gaskets. In addition, spills of a chromium containing solution used on the coil coating line are absorbed with "Floor-dry" and are managed as a toxic hazardous waste. These wastes are accumulated in 55-gallon steel drums near the coil coating line. When filled, the drums are sealed and moved to Building 15 for temporary storage for eventual off-site disposal. Building 15 is located at the south end of the Beech Bottom Plant and is designated as the hazardous waste storage area. The building is constructed with a metal frame, metal siding and metal roof. The building has a dry-pipe sprinkler system. The building is kept locked with keys maintained at the plant patrolman's office.

Spills

In the event of a spill of the flammable hazardous wastes, the leaking liquids would be absorbed with an absorbent such as "Floor-dry", picked up and placed in drums for disposal as hazardous waste. Any leaking drums would be inspected and either have the

BEECH BOTTOM PLANT
HAZARDOUS WASTE CONTINGENCY PLAN

liquid absorbed in place or have the liquid and other contents transferred to a good drum for eventual disposal.

Spills of the chromium and "Floor-dry" waste and the rags, filters and other waste would be picked up and put back into drums.

Spill control material at the Beech Bottom Plant consists of absorbents ("Floor-dry"), absorbent pads and chips, and absorbent booms. These are stored at various places in the plant. Spill control equipment at the plant consists of shovels and other hand tools which are stored in the maintenance area.

Fires

In the event of a fire in the flammable hazardous waste storage area, the building has a dry-pipe sprinkler system for protection. This system has an alarm in the plant patrolman's office. There are portable dry chemical units and foam extinguishers in the buildings adjacent to Building 15 available for fire fighting. There is also a fire hydrant on the west side of Building 15 for fire fighting.

If assistance is required, the Beech Bottom, Short Creek, Windsor Heights and Wellsburg fire departments are available. The Beech Bottom Fire Department has toured the plant. They were shown hydrant locations and the area where the flammable hazardous wastes are stored.

BEECH BOTTOM PLANT
HAZARDOUS WASTE CONTINGENCY PLAN

Emergency Coordinators

The following emergency coordinators can be reached during business hours by calling 304-234-2683, and after business hours by calling 304-234-7628.

William R. Samples

Thomas J. Waligura

The following Emergency Coordinators are Beech Bottom Plant personnel and can be reached during and after business hours:

<u>Position</u>	<u>Name</u>	<u>Home Address</u>
Plant Manager	S. F. Beecroft Plant phone: Ext. 4275 Home phone: 304-277-2238	25 Warwood Terrace Wheeling, WV 26003
Supervisor, Environmental	J. M. Howell Plant phone: Ext. 4223 Home phone: 304-233-0489	609 N. Erie Street Wheeling, WV 26003
Hazardous Waste Coordinator, Wheeling Corrugating Company	J. F. Allen Plant phone: Ext. 4273 Home phone: 304-232-8929	150 G C & P Road Wheeling, WV 26003
Superintendent, Maintenance & Services	M. W. O'Leary Plant phone: Ext. 4219 Home phone: 304-242-8140	51 Acosta Avenue Wheeling, WV 26003

BEECH BOTTOM PLANT
HAZARDOUS WASTE CONTINGENCY PLAN

Police - Security

The Beech Bottom Plant has its own security personnel on duty 24 hours per day. If necessary, the Brooke County Sheriff's Department or the Wellsburg Detachment of the West Virginia State Police will be called for assistance.

Hospitals

The Beech Bottom Plant has a registered nurse on duty in the Plant Dispensary during weekdays from 7:00 a.m. to 3:00 p.m. Personnel requiring medical attention will be cared for at the in-plant dispensary, if possible, or will be transported to a local hospital.

Communications

The Beech Bottom Plant has an FM radio communications system consisting of a base station in the plant patrolman's office and several hand-held mobile units in use by personnel throughout the plant. The patrolman has a citizens' band base station in his office along with telephones.

Alarms

The Beech Bottom Plant has several sprinkler systems throughout the plant. Each system has an alarm that is connected to an annunciator panel located in the plant

BEECH BOTTOM PLANT
HAZARDOUS WASTE CONTINGENCY PLAN

patrolman's office. If a sprinkler system trips, an alarm sounds and a light on the annunciator panel comes on.

Emergency Equipment

The following emergency equipment and/or materials are available at the Beech Bottom Plant:

1. Fire Protection
 - a. Sprinkler system in paint/solvent storage building
 - b. Sprinkler system in hazardous waste storage building
 - c. Portable fire extinguishers located throughout the plant
2. Absorbent Materials
 - a. Absorbent pads stored in the paint/solvent storage building at the wastewater treatment plant
 - b. "Floor-dry" stored in small quantities at various areas along the coil coating line for immediate usage requirements.
 - c. "Floor-dry" in bulk, stored on skids in the south end of Building 8.
 - d. Wiping rags are stored in each coil coating line coater room for use in absorbing spilled paint and normal clean-up of the coating rolls.

BEECH BOTTOM PLANT
HAZARDOUS WASTE CONTINGENCY PLAN

3. Storage Materials
 - a. These are empty 55-gallon open top steel drums that are normally stored outside the south end of Building 8.
4. Tools
 - a. Hand trucks are available at the coil coating line coater room, from the plant storeroom, and from the maintenance tool storage area for use in transporting drums of materials.
 - b. Shovels are available at the maintenance tool storage area for use in picking up spilled materials and absorbents.

Evacuation

The hazardous wastes at the Beech Bottom Plant are stored in areas outside the main plant buildings. Evacuation from Building 15 will be north into and through the main plant, or east, west and south into the open field area surrounding Building 15.

Except for personnel directly involved with any clean-up or fire fighting activity, other plant personnel would be kept out of the area.

State Emergency Response Teams

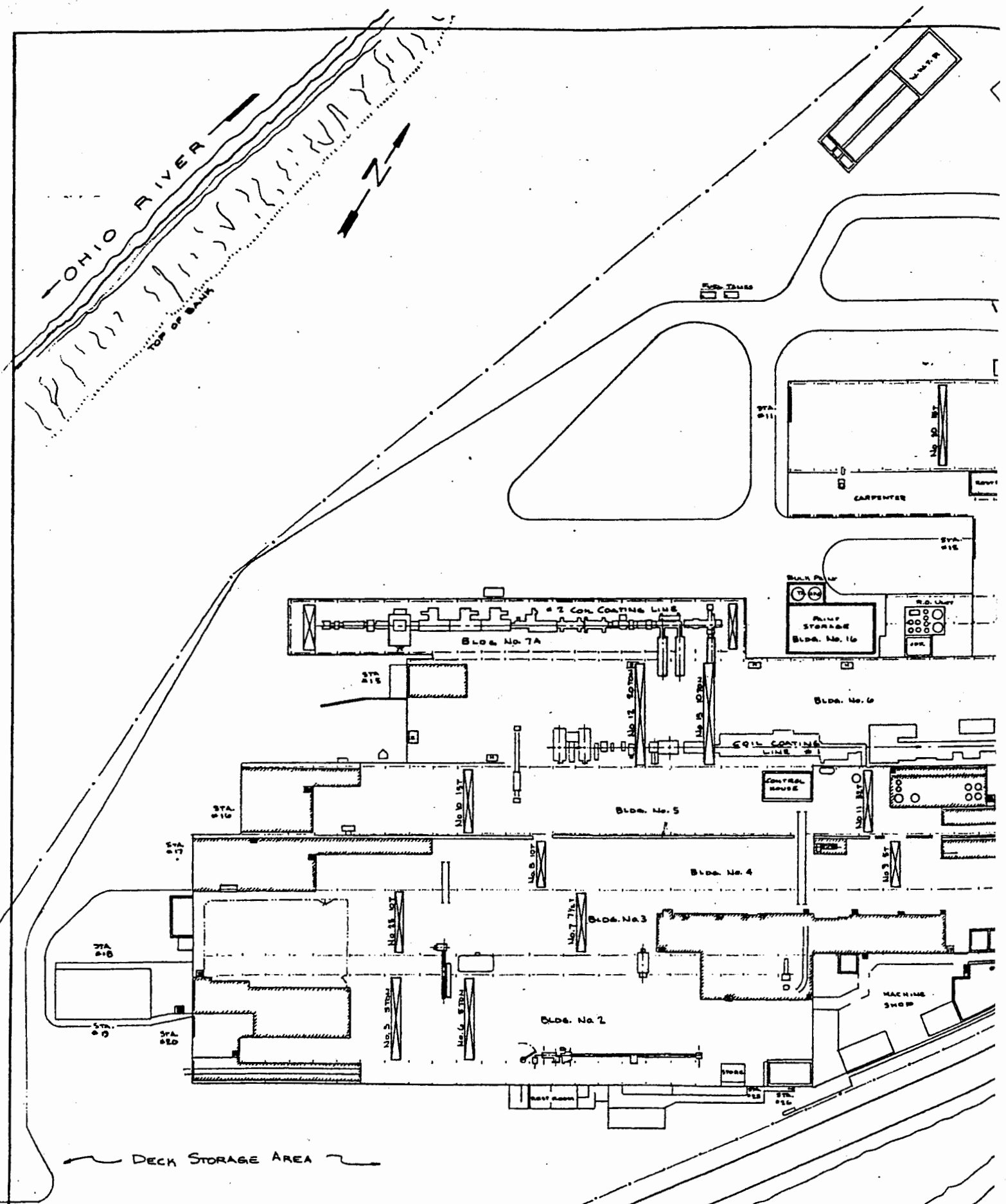
The Emergency Coordinators previously listed will make any necessary contacts to the State Emergency Response Teams and the Local Emergency Planning Committee (Brooke County Sheriff's Office).

BEECH BOTTOM PLANT
HAZARDOUS WASTE CONTINGENCY PLAN

Traffic Pattern, Volume and Control

Shipments of hazardous waste from the Beech Bottom Plant are by truck. Only one shipment occurs at a time, and the plant is not confined in terms of the area. Traffic control is considered unnecessary.

JFA/vll
c:\data\wper\hazwaste.92



REFERENCES				REVISIONS				TOLERANCES			
NO.	BY	DATE	DESCRIPTION	NO.	BY	DATE	DESCRIPTION	FRACTIONS	DECIMALS	PERCENTS	OTHER
THIS DRAWING AND ALL DESIGN AND DETAILS SHOWN ON IT ARE THE PROPERTY OF WHEELING-PITTSBURGH STEEL CORPORATION AND ARE CONFIDENTIAL. THE DRAWING IS NOT TO BE COPIED WITHOUT WRITTEN PERMISSION OF WHEELING-PITTSBURGH STEEL CORPORATION.											